City of Loma Linda

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Community Development Department

ENVIRONMENTAL CHECKLIST FORM AND INITIAL STUDY

Project Title: California Eye Care Center (CUP No. P19-071)

Lead Agency: City of Loma Linda Community Development Department
25441 Barton Road, Loma Linda, CA 92354

Lead Agency Contact Person: Lorena Matarrita, Associate Planner
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Applicant: C/O Brad Freeman
Freeman and Associates
PO Box 8248, Redlands, CA 92375

Study Prepared By: Ernest Perea
Romo Planning Group, Inc
8338 Garden Street, Alta Loma, CA 91701

General Plan Designation: Commercial

Zoning: East Valley Corridor Specific Plan / General Commercial (EVC-CG)

Project Location (Address/Nearest Cross-Streets): The Project Site is located at 25258 Redlands Boulevard Loma Linda, CA 92354, (northwest corner of Redlands Boulevard and Richardson Street). APNs: 0281-162-33, 34. Refer to Exhibit 1: Project Location Map and Aerial Photo.

Project Description: Freeman and Associates is requesting approval for the construction of a 2-story, 30,382 square foot mixed-use facility to include an eye surgery center and space for medical offices and retail. The Project also includes the processing of Tentative Tract Map No. P19-122 to combine the two lots into one (Map 20129) as well as a Comprehensive Sign Program No. P19-134 to establish future signage criteria for the site.

Proposed access to the Project site will be provided by a right-in and right-out only driveway on Redlands Boulevard and a full access driveway on Richardson Street. Water and sewer service to the Project site will be provided by the City of Loma Linda. The Project will connect to the existing water and sewer lines in Redlands Boulevard.

Existing Site Conditions/Environmental Setting: CEQA Guidelines §15125 establishes requirements for defining the environmental setting to which the environmental effects of a proposed project must be compared. The environmental setting is defined as "…the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published, or if no Notice of Preparation is published, at the time the environmental analysis is commenced…" (CEQA Guidelines §15125[a]).

In the case of the proposed Project, the Initial Study Checklist determined that a Mitigated Negative Declaration is the appropriate form of CEQA compliance document, which does not require a Notice of Preparation. Thus, the environmental setting for the Project is the approximate date that the Project's Initial Study Checklist commenced in August 2019.

The Project site consists of approximately 2.0 acres. The Project site is basically a cleared lot with some invasive vegetation near the Project boundaries. Topography of the site is relatively flat and generally slopes toward the southwest. The elevation of the site ranges from approximately 1,088 feet above mean sea level to 1,087 above mean sea level. Redlands Boulevard, a 4-lane roadway with curb, gutter, and sidewalk borders the southern boundary of the site. Richardson Street, a two-lane roadway with curb, gutter, and sidewalk borders the eastern boundary of the site.

Surrounding land uses are shown on Table 1.

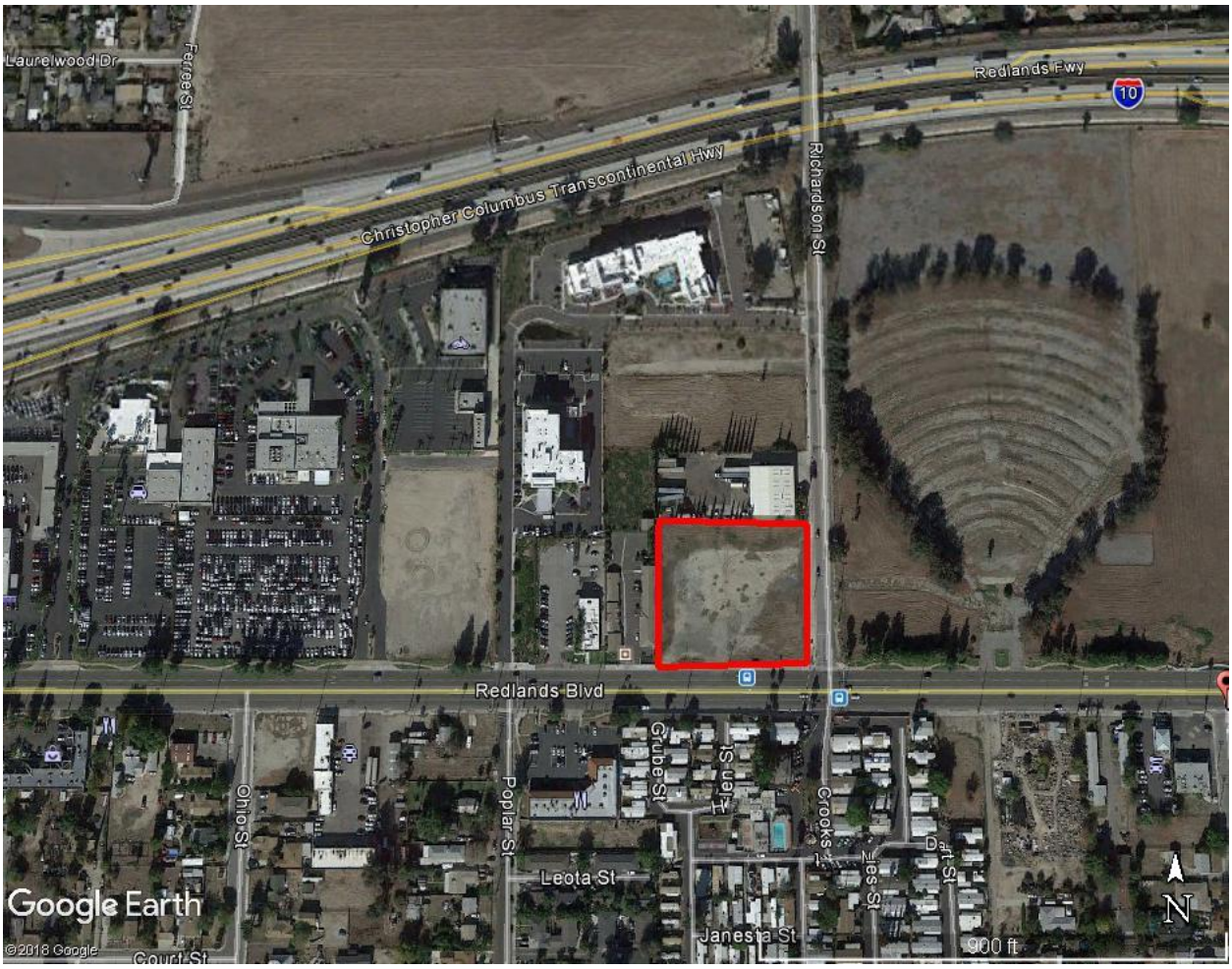
Table 1. Existing Land Uses

Location	Existing Use
Site	Vacant land
North	Truck service business
South	Redlands Boulevard followed by a mobile home park
East	Richardson Street followed by vacant land
West	Dutch Motel
Source: Field Inspection, August 2019.	

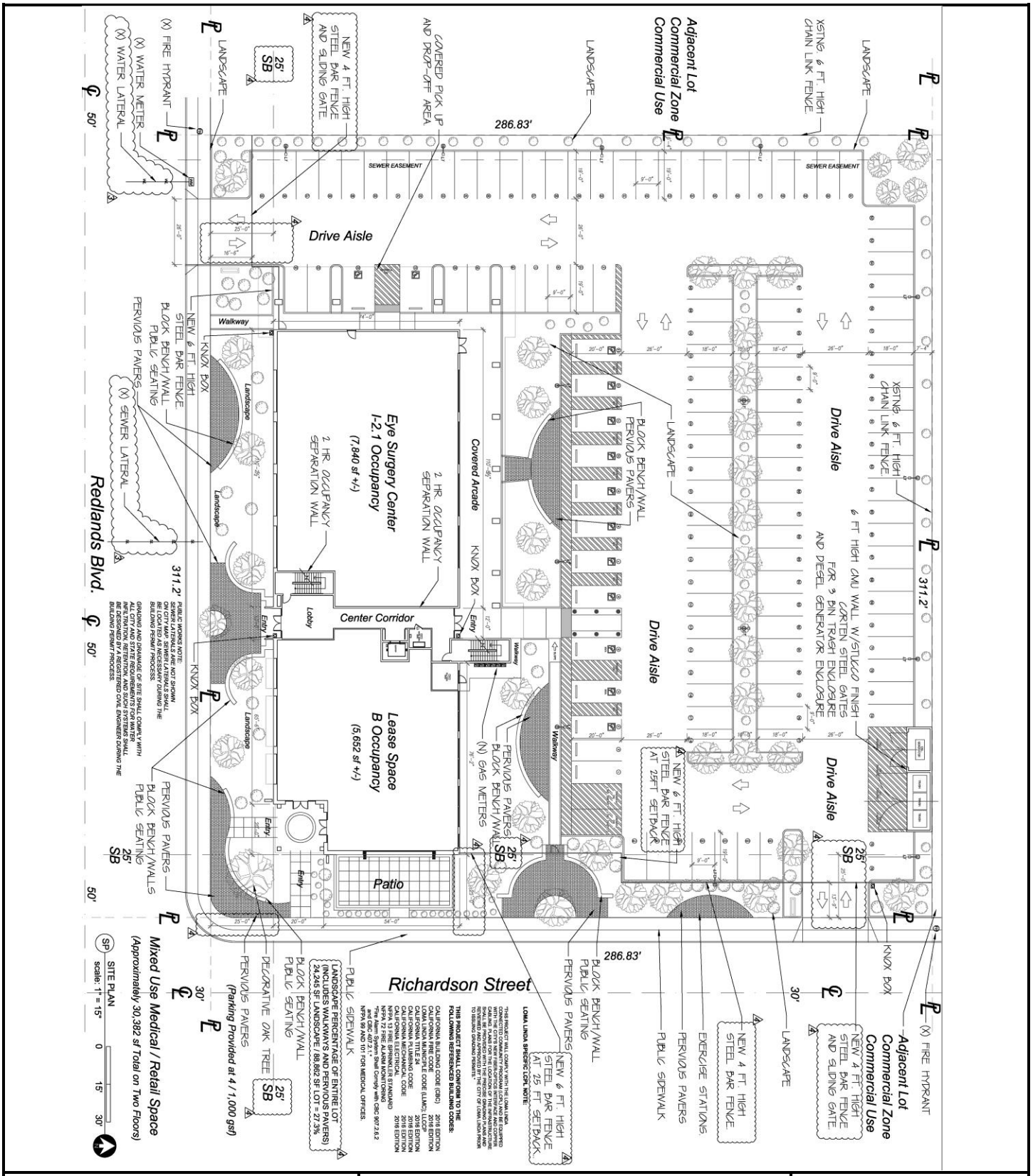
Existing General Plan Designations and Zoning Classifications are shown on Table 2.

Table 2. Existing General Plan Designations and Classifications

Location	General Plan Designation	Zoning Classification
Site	Commercial	East Valley Corridor Specific Plan / General Commercial (EVC-CG)
North	Commercial	East Valley Corridor Specific Plan / General Commercial (EVC-CG)
South	Commercial	East Valley Corridor Specific Plan / General Commercial (EVC-CG)
East	Commercial	East Valley Corridor Specific Plan / General Commercial (EVC-CG)
West	Commercial	East Valley Corridor Specific Plan / General Commercial (EVC-CG)
Source: City of Loma Linda-General Plan Land Use Map, City of Loma Linda Zoning Map		



California Eye Care Center **25258 Redlands Blvd.**	**Project Location Map/Aerial Photo**	**Exhibit 1**



California Eye Care Center **25258 Redlands Blvd.**	**Site Plan**	**Exhibit 2**

EVALUATION FORMAT:

This Initial Study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. This format of the study is presented as follows. The project is evaluated based on its effect on 20 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	*Less than Significant With Mitigation Incorporated*	*Less than Significant*	*No Impact*

Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

1. **No Impact**: No impacts are identified or anticipated and no mitigation measures are required.
2. **Less than Significant Impact**: No significant adverse impacts are identified or anticipated and no mitigation measures are required.
3. **Less than Significant Impact with Mitigation Incorporated**: Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List of mitigation measures)
4. **Potentially Significant Impact**: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are (List of the impacts requiring analysis within the EIR).

At the end of the analysis the required mitigation measures are restated and categorized as being either self- monitoring or as requiring a Mitigation Monitoring and Reporting Program.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

Determination

On the basis of this initial evaluation:

I find that the proposed use COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be recommended for adoption. ☐

I find that although the proposal could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project Applicant. A MITIGATED NEGATIVE DECLARATION will be recommended for adoption. **X**

I find that the proposal MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☐

I find that the proposal MAY have a significant effect(s) on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a “potentially significant impact” or “potentially significant unless mitigated.” An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the proposed Project could have a significant effect on ☐

the environment, because all potentially significnat effect (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION, pursuant to all applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures are are imposed upon the proposed Project, nothing further is required.

Signature

Konrad Bolowich, Assistant City Manager

Printed Name/Title Date

Appendices (On Compact Disk)

Appendix A. California Emissions Estimator Model Air Quality/Greenhouse Gas Outputs (Romo Planning Group July 29, 2015.

Appendix B. Phase 1 Cultural Resources Assessment, L&L Environmental Inc., November 5, 2019.

Appendix C. Phase I Paleontological Resources Inventory, L&L Environmental Inc., November 5, 2019.

Appendix D. Preliminary Water Quality Management Plan (Encompass Associates, Inc.), August 26, 2019.

Appendix E. Traffic Impact Analysis (Urban Crossroads), October 16, 2019.

3.1 AESTHETICS

Would the Project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?			■	
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				■
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			■	
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			■	

3.1 (a) Have a substantial adverse effect on a scenic vista?

Determination: Less Than Significant Impact.

Sources: Loma Linda General Plan, Google Earth, Project Application Materials.

Impact Analysis

Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. According to the General Plan Conservation and Open Space Element, the hillside portions of the City ("South Hills'), and particularly the Hillside Conservation Area, are identified as important visual resources within the City. The Project site is located approximately 1.5 miles north of the South Hills in an area that is predominantly developed with urban uses. Existing public vantage points that exist along Redlands Boulevard and Richardson Street adjacent to the Project site do not provide uninterrupted expansive views of the South Hills.

In addition, the Project site is located within a developed area and is not within or adjacent to a scenic vista. Surrounding land uses include a truck servicing facility to the north, Redlands Boulevard followed by a mobile home park to the south, Richardson Street followed by vacant land to the east, and a motel to the west.

Based on the analysis above, impacts to scenic vistas are less than significant.

3.1 (b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Determination: No Impact.
Source: California Department of Transportation.

Impact Analysis

California's Scenic Highway Program was created by the Legislature in 1963. Its purpose is to protect and enhance the natural scenic beauty of California highways and adjacent corridors, through special conservation treatment. The state laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263.

According to the California Department of Transportation, the Project site is not located within a State Scenic Highway. Therefore, construction and the long-term operation of the project would have no impact on scenic resources within a scenic highway.

3.1 (c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Determination: Less Than Significant Impact.

Sources: Project Application Materials.

Impact Analysis

According to the Census 2010 Urbanized Area Outline Maps, the Project site is located in the Riverside-San Bernardino, CA Urbanized Area. As such, the Project is subject to applicable General Plan and zoning regulations governing scenic quality. The design standards within the General Plan Community Design Element and the development regulations within the East Valley Corridor Specific Plan have been established by the City to ensure that both new development projects and existing land uses are visually compatible. The Project has been designed to be consistent with the design standards contained in the General Plan Community Design Element and the East Valley Corridor Specific Plan to ensure that the Project blends into the existing visual character and quality of its surroundings.

Based on the analysis above, the Project will not degrade the existing visual character or quality of public views of the site and its surroundings and impacts are less than significant and no mitigation measures are required.

3.1 (d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Determination: Less Than Significant Impact.

Source: Project Application Materials

Impact Analysis

The Project would increase the amount of light in the area above what is being generated by the vacant site by directly adding new sources of illumination including building and parking lot lighting. Section 17.24.310 of the City's Zoning Ordinance and Section EV4.0215 "Site Lighting" of the East Valley Corridor Specific Plan require that parking lot lighting shall be arranged so that it is directed onto the parking area and reflected away from adjacent property. Therefore, impacts associated with lighting will be less than significant. The proposed building materials consist primarily of stucco with burnished block and glare-reducing tinted glass. These materials are non-reflective and would not contribute to glare.

Based on the analysis above, impacts would be less than significant with mandatory compliance with the Section 17.24.310 of the City's Zoning Ordinance and Section EV4.0215 of the East Valley Corridor Specific Plan.

3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:	**Potentially Significant Impact**	**Less Than Significant Impact With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				■
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				■
d. Result in the loss of forest land or conversion of forest land to non-forest use?				■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				■

3.2 (a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? .

Determination: No Impact

Source: California Department of Conservation "Farmland Mapping and Monitoring Program.

Impact Analysis

The Project site is identified by the California Department of Conservation Important Farmland Finder as "Urban and Built-Up Land." The site does not contain any lands designated as Prime

Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the State Department of Conservation Farmland Mapping and Monitoring Program. As such, the Project has no potential to convert such lands to a non-agricultural use and no impact would occur.

3.2 (b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Determination: No Impact.
Sources: General Plan Land Use Map, Zoning Map, San Bernardino County Assessor.

Impact Analysis

Agricultural Zoning

The zoning classification for the site is East Valley Corridor Specific Plan / General Commercial (EVC-CG) which allows a variety of commercial uses and does not allow agricultural uses as a primary use. Therefore, the Project does not conflict with existing zoning for agricultural use.

Williamson Act

Pursuant to the California Land Conservation Act of 1965, a Williamson Act Contract enables private landowners to voluntarily enter into contracts with local governments for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive lower property tax assessments based upon farming and open space uses as opposed to full market value. According to the San Bernardino County Assessor, the site is not under a Williamson Act Contract. As such, there is no impact.

3.2 (c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)?

Determination: No Impact.
Sources: General Plan Land Use Map, Zoning Map.

Impact Analysis

The zoning classification for the site is East Valley Corridor Specific Plan / General Commercial (EVC-CG). The Project site does not contain any forest lands, timberland, or timberland zoned as Timberland Production, nor are any forest lands or timberlands located on or nearby the Project site. Because no lands on the Project site are zoned for forestland or timberland, the project has no potential to impact such zoning. No impact would.

3.2 (d) Result in the loss of forest land or conversion of forest land to non-forest use?

Determination: No Impact.
Source: Field Survey.

Impact Analysis

The Project site and surrounding properties do not contain forest lands, are not zoned for forest land. Because forest land is not present on the Project site or in the immediate vicinity of the Project site, the Project has no potential to result in the loss of forest land or the conversion of forest land to non-forest use. No impact would occur.

3.2 (e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

Determination: No Impact.
Sources: General Plan Land Use Map, Field Survey.

Impact Analysis

The Project site is approximately 2.0 acres in size and is located in an area largely characterized by residential and commercial development. There is no land being used primarily for agricultural purposes in the vicinity of the site. As such, the Project would not result in conversion of Farmland to non-agricultural use and no impacts would occur.

3.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?			■	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?			■	
c. Expose sensitive receptors to substantial pollutant concentrations?			■	
d. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?			■	

3.3 (a) Conflict with or obstruct implementation of the applicable air quality plan (South Coast Air Quality Management District)?

Determination: Less Than Significant Impact.

Sources: California Emissions Estimator Model Outputs (Appendix A), South Coast Air Quality Management District, Air Quality Management Plan, CEQA Air Quality Handbook.

Impact Analysis

Federal Air Quality Standards

Under the Federal Clean Air Act, the Federal Environmental Protection Agency establishes health-based air quality standards that California must achieve. These are called "national (or federal) ambient air quality standards" and they apply to what are called "criteria pollutants." Ambient (i.e. surrounding) air quality standard establish a concentration above which a criteria pollutant is known to cause adverse health effects to people. The national ambient air quality standards apply to the following criteria pollutants:

- Ozone (8-hour standard)
- Respirable Particulate Matter (PM10)
- Fine Particulate Matter (PM2.5)
- Carbon Monoxide (CO)
- Nitrogen Dioxide (NOx)
- Sulphur Dioxide (SO2), and
- Lead.

State Air Quality Standards

Under the California Clean Air Act, the California Air Resources Board also establishes health-based air quality standards that cities and counties must meet. These are called "state ambient air quality standards" and they apply to the following criteria pollutants:

- Ozone (1-hour standard)
- Ozone (8-hour standard)
- Respirable Particulate Matter (PM10)
- Fine Particulate Matter (PM2.5)
- Carbon Monoxide (CO)
- Nitrogen Dioxide (NOx)
- Sulphur Dioxide (SO2), and
- Lead

Regional Air Quality Standards

The City of Loma Linda is located within the South Coast Air Basin which is under the jurisdiction of the South Coast Air Quality Management District. The District develops plans and regulations designed to achieve these both the national and state ambient air quality standards described above.

Attainment Designation

An "attainment" designation for an area signifies that criteria pollutant concentrations did not exceed the established standard. In contrast to attainment, a "nonattainment" designation indicates that a criteria pollutant concentration has exceeded the established standard. Table 4 shows the attainment status of criteria pollutants in the South Coast Air Basin.

Table 4. Attainment Status of Criteria Pollutants in the South Coast Air Basin.

Criteria Pollutant	State Designation	Federal Designation
Ozone – 1 hour standard	Nonattainment	No Standard
Ozone – 8 hour standard	Nonattainment	Nonattainment
Respirable Particulate Matter (PM10)	Nonattainment	Nonattainment
Fine Particulate Matter (PM2.5)	Nonattainment	Nonattainment
Carbon Monoxide (CO)	Attainment	Attainment
Nitrogen Dioxide (N0x)	Nonattainment	Attainment
Sulfur Dioxide (SO2)	Attainment	Attainment
Lead	Attainment	Attainment
Source: South Coast Air Quality Management District, 2014		

Air Quality Management Plan

The South Coast Air Quality Management District is required to produce air quality management plans directing how the South Coast Air Basin's air quality will be brought into attainment with the national and state ambient air quality standards. The most recent air quality management plan is 2016 Air Quality Management Plan and it is applicable to City of Loma Linda. The purpose of the 2016 Air Quality Management Plan is to achieve and maintain both the national and state ambient air quality standards described above.

In order to determine if a project is consistent with the 2016 Air Quality Management Plan, the South Coast Air Quality Management District has established consistency criterion which are defined in Chapter 12, Sections 12.2 and 12.3 of the South Coast Air Quality Management District's *CEQA Air Quality Handbook* and are discussed below.

Consistency Criterion No. 1: *The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the 2012 Air Quality Management Plan.*

Consistency Criterion No. 1 refers to violations of the California Ambient Air Quality Standards and National Ambient Air Quality Standards. As evaluated under Issues 3.3 (b) and (c) below, the Project would not exceed regional or localized significance thresholds for any criteria pollutant during construction or during long-term operation. Accordingly, the Project's regional and localized emissions would not contribute substantially to an existing or potential future air quality violation or delay the attainment of air quality standards.

Consistency Criterion No. 2: *The proposed project will not exceed the assumptions in the 2016 Air Quality Management Plan.*

The growth forecasts used in the 2016 Air Quality Management Plan to estimate future emissions levels are based on the projections of the Regional Transportation Model utilized by the Southern California Association of Governments, which incorporates land use data provided by city and county General Plans, as well as assumptions regarding population number, location of population growth, and a regional housing needs assessment.

The General Plan land use designation currently assigned to the Project site is Commercial. The future emission forecasts contained in the 2016 Air Quality Management Plan are primarily based on demographic and economic growth projections provided by the Southern California Association of Governments. The Project was designated for commercial development at the time the 2016 Air Quality Management Plan adopted. Therefore, the Project will not exceed the growth forecast estimates used in the 2016 Air Quality Management Plan.

For the reasons stated above, the Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, delay the timely attainment of air quality standards or the interim emissions reductions specified in the 2016 Air Quality Management Plan. In addition, the Project would not exceed the growth assumptions in the 2016 Air Quality Management Plan. As such, the Project would be consistent with the 2016 Air

Quality Management Plan and impacts would be less than significant and no mitigation measures are required.

3.3(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?

Determination: Less Than Significant Impact.

Sources: California Emissions Estimator Model Outputs (Appendix A), South Coast Air Quality Management District, Air Quality Management Plan, CEQA Air Quality Handbook.

Impact Analysis

As shown in Table 4, the South Coast Air Basin, in which the Project is located, is considered to be in "non-attainment" status for several criteria pollutants.

The South Coast Air Quality Management District has developed regional and localized significance thresholds for regulated pollutants. Any project in the South Coast Air Basin with daily emissions that exceed any of the indicated regional or localized significance thresholds would be considered to contribute to a projected air quality violation. The Project's regional and localized air quality impacts are discussed below.

Regional Impact Analysis

As with any new development project, the Project has the potential to generate pollutant concentrations during both construction activities and long-term operation. The following provides an analysis based on the applicable regional significance thresholds established by the South Coast Air Quality Management District in order to meet national and state air quality standards.

Table 5. South Coast Air Quality Management District Air Quality Regional Significance Thresholds

Pollutant	Emissions (Construction) (pounds/day)	Emissions (Operational) (pounds/day)
NOx	100	55
VOC	75	55
PM10	150	150
PM2.5	55	55
SOx	150	150
CO	550	550
Lead	3	3
Source: South Coast Air Quality Management District CEQA Air Quality Significance Thresholds (2009)		

Both construction and operational emissions for the Project were estimated by using the California Emissions Estimator Model which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. The model can be used for a variety of situations where an air quality analysis is necessary or desirable such as California Environmental Quality Act (CEQA) documents and is authorized for use by the South Coast Air Quality Management District.

Construction Related Impacts

Construction activities associated with the Project will result in emissions of CO, VOCs, NOx, SOx, PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following onsite and offsite construction activities:

- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coatings (Painting)

Assumptions for equipment use and duration used to estimate air quality emissions are shown in Table 6 below.

Table 6. Construction Equipment List

Phase	Equipment Type	Number of Units	Hours/ Day	Horse Power
Site Preparation	Rubber Tired Dozer	1	7	247
Site Preparation	Tractor/Loader/Backhoe	1	8	97
Site Preparation	Grader	1	8	187
Grading	Grader	1	6	187
Grading	Rubber Tired Dozer	1	6	247
Grading	Tractor/Loader/Backhoe	1	7	97
Bldg Construction	Cranes	1	6	231
Bldg Construction	Generator Sets	1	8	84
Bldg Construction	Tractor/Loader/Backhoe	1	6	97
Bldg Construction	Welder	3	8	46
Paving	Paver	1	6	130
Paving	Rollers	1	7	80
Paving	Tractor/Loader/Backhoe	1	8	97
Paving	Paving Equipment	1	8	132
Paving	Cement & Mortar Mixer	1	6	9
Architectural Coating	Air Compressor	1	6	78
Source: CalEEMod Outputs (Appendix A).				

Table 7 below shows the South Coast Air Quality Management District Regional Thresholds for construction emissions compared to the project's maximum emissions without utilizing the standard Best Available Control Measures contained in South Coast Air Quality Management District regulatory requirements.

Table 7. Construction Emissions (Without Best Available Control Measures)

Maximum Daily Emissions	Emissions (pounds per day)					
	NOx	VOC	CO	SOx	PM10	PM2.5
	18.37	29.82	14.78	0.03	6.71	3.73
Regional Threshold	**100**	**75**	**550**	**150**	**150**	**55**
Exceeds Regional Threshold?	NO	NO	NO	NO	NO	NO
Source: CalEEMod Outputs (Appendix A).						

As shown in Table 7 above, construction related emissions would not exceed South Coast Air Quality Management District regional construction criteria thresholds without Best Available Control Measures. However, The Project is required to comply with the provisions of South Coast Air Quality Management District Rule 403, "*Fugitive Dust*." Rule 403 requires implementation of Best Available Control Measures during construction activities that generate fugitive dust, such as earth moving and stockpiling activities, grading, and equipment travel on unpaved roads. With adherence to Rule 403 PM_{10} emissions are reduced by 52% and $PM_{2.5}$ emissions are reduced by 48% as shown on Table 8 below.

Table 8. Construction Emissions (With Best Available Control Measures)

Maximum Daily Emissions	Emissions (pounds per day)					
	NOx	VOC	CO	SOx	PM10	PM2.5
	18.37	29.82	14.78	0.03	3.17	1.93
Regional Threshold	**100**	**75**	**550**	**150**	**150**	**55**
Exceeds Regional Threshold?	NO	NO	NO	NO	NO	NO
Source: CalEEMod Outputs (Appendix A).						

Based on the above, the Project would not emit substantial concentrations of these pollutants during construction and would not contribute to an existing or projected air quality violation, on a direct or cumulative basis.

Long-Term Regional Operational Related Impacts

The Project would be operated as a mixed-use office/retail building. Typical operational characteristics include visitors traveling to and from the site, delivery of goods to the site, and maintenance activities.

Table 9 below shows the South Coast Air Quality Management District Regional Thresholds for operational emissions compared to the Project's maximum daily emissions.

Table 9. Maximum Daily Operational Emissions

Maximum Daily Emissions	Emissions (pounds per day)					
	NOx	VOC	CO	SOx	PM10	PM2.5
	8.51	2.42	20.32	0.08	6.11	1.67
Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Regional Threshold?	NO	NO	NO	NO	NO	NO
Source: CalEEMod Outputs (Appendix A).						

As shown in Table 9 above, operational related emissions would not exceed South Coast Air Quality Management District regional operational criteria thresholds. Accordingly, the Project would not emit substantial concentrations of these pollutants during operation and would not contribute to an existing or projected air quality violation, on a direct or cumulative basis.

Based on the analysis above, both construction and operational regional air quality impacts are less than significant.

3.3(c) Expose sensitive receptors to substantial pollutant concentrations?

Determination: Less Than Significant Impact.

Sources: California Emissions Estimator Model Outputs (Appendix A), South Coast Air Quality Management District, Air Quality Management Plan, CEQA Air Quality Handbook.

Impact Analysis

Sensitive Receptors

Sensitive receptors (i.e., children, senior citizens, and acutely or chronically ill people) are more susceptible to the effects of air pollution than the general population. Land uses that are considered sensitive receptors typically include residences, schools, playgrounds, childcare centers, hospitals, convalescent homes, and retirement homes. The closest sensitive receptors would be the mobile home park to the south of the site across Redlands Boulevard and the motel to the east of the Project site.

Localized Impact Analysis

The South Coast Air Quality Management District has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the national and/or state ambient air quality standards. The South Coast Air Quality Management District has established Localized Significance Thresholds which were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities.

Localized Significance Thresholds are only applicable to the following criteria pollutants: oxides of nitrogen (NOX), carbon monoxide (CO), particulate matter less than 10 microns in aerodynamic diameter (PM_{10}) and particulate matter less than 2.5 microns in aerodynamic diameter ($PM_{2.5}$). Localized Significance Threshold's represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable national or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor which are the single-family homes to the east.

Table 10 below shows the South Coast Air Quality Management's Localized Significance Thresholds for construction and operational emissions compared to the Project's maximum localized emissions at 25 meters (83 feet) from the site boundary.

Table 10. LST Analysis (1 acre - Receptor @ 25 meters)

Pollutant	LST Significance Threshold Lbs/Day*	Project Emissions (mitigated)	Exceeds Threshold?
(NO_X) for Construction and Operation	118	18.37	**NO**
(CO) for Construction and Operation	775	20.32	**NO**
PM 10 for Operation	1	<0.1	**NO**
PM10 for Construction	4	3.17	**NO**
PM 2.5 for Operation	1	<0.1	**NO**
PM2.5 for Construction	4	1.93	**NO**
Source: CalEEMod Outputs (Appendix A).			

As shown on Table 10 above, Localized Significance Thresholds will not be exceeded and impacts are less than significant.

CO Hot Spots

CO Hot Spots are typically associated with idling vehicles at extremely busy intersections (i.e., intersections with an excess of 100,000 vehicle trips per day). There are no intersections in the vicinity of the Project site which exceed the 100,000 vehicle per day threshold typically associated with CO Hot Spots. In addition, the South Coast Air Basin has been designated as an attainment area for CO since 2007. Therefore, Project-related vehicular emissions would not create a CO Hot Spot and would not substantially contribute to an existing or projected CO Hot Spot.

Based on the analysis above, impacts are less than significant.

Toxic Air Contaminants (TAC)

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed Project. The Office of Environmental Health Hazard Assessment (OEHHA) has issued the *Air Toxic Hot Spots Program Risk Assessment Guidelines and Guidance Manual for the Preparation of Health Risk Assessments*, February 2015, to provide a description of the algorithms, recommended exposure variates, cancer and non-cancer health values, and the air modeling protocols needed to perform a health risk assessment (HRA) under the Air Toxics Hot Spots Information and Assessment Act of 1987. All substances that are evaluated for cancer risk and/or non-cancer acute, 8-hour, and chronic health impacts. Given the relatively limited number of heavy-duty construction equipment and the short-term construction schedule, the proposed Project would not result in a long-term substantial source of toxic air contaminant emissions and corresponding individual cancer risk. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the Project. In addition, the Project is a mixed-use medical office/retail facility which is not a use that generates the type of vehicle traffic (i.e. diesel trucks) that would expose people to TAC's.

Based on the analysis above, impacts are less than significant.

3.3 (d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

Determination: Less Than Significant Impact.
Source: CEQA Air Quality Handbook, Project Application Materials.

Impact Analysis

According to the South Coast Air Quality Management District *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project is a medical office/retail building and does not include any of the above identified uses and therefore would not produce objectionable odors during operation.

Construction activities both onsite and offsite could produce odors from equipment exhaust, application of asphalt, and/or the application of architectural coatings. However, any odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon completion of construction activities.

Based on the analysis above, impacts are less than significant.

3.4 BIOLOGICAL RESOURCES

Would the Project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				■
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				■
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				■
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				■
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				■
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				■

3.4(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Determination: No Impact.

Source: General Plan Conservation and Open Space Element, Site Inspection.

Impact Analysis

The Project site is located in a predominantly developed setting and has been heavily disturbed by human activities. The Project site is basically a cleared lot with some invasive vegetation near the Project boundaries.

According to the General Plan Conservation and Open Space Element, Critical Habitat identifies specific areas that are essential to the conservation of a listed species and may require special management considerations or protection As shown on Figure 9.4 Critical Habitat of the General Plan Conservation and Open Space Element, the Project site is not located in an area designated as Critical Habitat. The Project site is located approximately 1.5 mile northeast of this biologically sensitive area of the City.

Based on the above, the Project will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species.

3.4(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Determination: No Impact.
Sources: General Plan Conservation and Open Space Element, Site Inspection.

Impact Analysis

No indication of riparian habitat or other sensitive natural communities was noted during the site inspection due to the highly disturbed nature of the site. In addition, According to Figure 9.3 Land Use and Vegetation of the General Plan Conservation and Open Space Element, the Project site is not located within an area containing riparian habitat or other sensitive natural community. As such, there is no impact to any riparian habitat or other sensitive natural community.

3.4(c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Determination: No Impact.
Sources: General Plan Conservation and Open Space Element, Site Inspection.

Impact Analysis

No indication of wetland was noted during the site inspection due to the highly disturbed nature of the site. In addition, according to Figure 9.3 Land Use and Vegetation of the General Plan Conservation and Open Space Element, the Project site is not located within an area containing wetland features. As such, there are no impacts to wetlands.

3.4(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Determination: Less Than Significant Impact.
Sources: General Plan Conservation and Open Space Element, Site Inspection.

Impact Analysis

The Project site consists of approximately 2.0 gross acres and is predominantly surrounded by existing development. According to Figures 9.3 Land Use and Vegetation and 9.4 Critical Habitat of the General Plan Conservation and Open Space Element, there is no Critical Habitat or other biological features on the site that would support wildlife corridors.

3.4(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Determination: No Impact.
Source: Municipal Code, Landscape Plans.

Impact Analysis

There are no trees located on the Project site. As such there are no impacts.

3.4(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Determination: No Impact.
Sources: U.S. Fish and Wildlife Service, California Department of Fish and Wildlife.

Impact Analysis

The Project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As such, there is no impact.

3.5 CULTURAL RESOURCES

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?				■
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?		■		
c. Disturb any human remains, including those interred outside of formal cemeteries?			■	

3.5(a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5?

Determination: No Impact.
Source: Phase I Cultural Resources Assessment (Appendix B).

Impact Analysis

Historic resources generally consist of buildings, structures, improvements, and remnants associated with a significant historic event or person(s) and/or have a historically significant style, design, or achievement. Damaging or demolition of historic resources is typically considered to be a significant impact. Impacts to historic resources can occur through direct impacts, such as destruction or removal, and indirect impacts, such as a change in the setting of a historic resource.

CEQA Guidelines §15064.5(a) clarifies that historical resources include the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.

2. A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements [of] section 5024.1(g) of the Public Resources Code.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

Based on the results of a records search completed at the SCCIC and a pedestrian survey, no known historical resources pursuant to CEQA are located on the Project site.

3.5(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?

Determination: Less Than Significant Impact with Mitigation Incorporated. *Source: Phase I Cultural Resources Assessment (Appendix B).*

Impact Analysis

Archaeological sites are locations that contain resources associated with former human activities, and may contain such resources as human skeletal remains, waste from tool manufacture, tool concentrations, and/or discoloration or accumulation of soil or food remains.

The Project site appears to have a moderate to low sensitivity for historic age and prehistoric archaeological resources and an archaeological mitigation-monitoring program is recommended.

MM (Mitigation Measures)

CUL-1 A qualified archaeologist (the "Project Archaeologist") shall be retained by the developer prior to the issuance of a grading permit. The Project Archaeologist will be on-call to monitor ground-disturbing activities and excavations on the Project site following identification of potential cultural resources by project personnel. If archaeological resources are encountered during implementation of the Project, ground-disturbing activities will be temporarily redirected from the vicinity of the find. The Project Archaeologist will be allowed to temporarily divert or redirect grading or excavation activities in the vicinity in order to make an evaluation of the find. If the resource is significant, Mitigation Measure CR-2 shall apply.

CUL-2 If a significant archaeological resource(s) is discovered on the property, ground disturbing activities shall be suspended 100 feet around the resource(s). The archaeological monitor, the Project Proponent, and the City of Loma Linda Community Development Department shall confer regarding mitigation of the discovered resource(s). A treatment plan shall be prepared and implemented by the archaeologist to protect the identified archaeological resource(s) from damage and destruction. The treatment plan shall contain a research design and data recovery program necessary to document the size and content of the discovery such that the resource(s) can be evaluated for significance under CEQA criteria. The research design shall list the sampling procedures appropriate to exhaust the research potential of the archaeological resource(s) in accordance with current professional archaeology standards (typically this sampling level is two (2) to five (5) percent of the volume of the cultural deposit). At the completion of the laboratory analysis, any recovered archaeological resources shall be processed and curated according to current professional repository standards. The collections and associated records shall be donated to an appropriate curation facility. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to the City of Loma Linda Community Development and the South Central Coastal Information Center.

With implementation of Mitigation Measures CUL-1 and CUL-2, impacts are less than significant.

3.5(c) Disturb any human remains, including those interred outside of formal cemeteries?

Determination: Less Than Significant Impact.

Sources: California Health and Safety Code §7050.5, Public Resources Code §5097 et. seq.

Impact Analysis

The Project site does not contain a cemetery and no known formal cemeteries are located within the immediate site vicinity. The Project site has been heavily disturbed by human activity so the potential for uncovering human remains at the Project site is considered low. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction.

In the event that human remains are discovered during Project grading or other ground disturbing activities, the Project would be required to comply with the applicable provisions of California Health and Safety Code §7050.5 as well as Public Resources Code §5097 et. seq. California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made by the Coroner.

If the Coroner determines the remains to be Native American, the California Native American Heritage Commission (NAHC) must be contacted and the NAHC must then immediately notify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

Based on the analysis above, impacts would be less than significant with compliance with the mandatory requirements of California Health and Safety Code §7050.5 as well as Public Resources Code §5097 et. seq.

3.6 ENERGY

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			■	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			■	

3.6(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Determination: Less Than Significant Impact.
Source: CalEEMod.

Impact Analysis
Implementation of the Project would result in increases in demand for electricity and natural gas as compared to the currently undeveloped project site, which does not have any energy consuming uses. Construction of the Project would create temporary increased demands for electricity and vehicle fuels compared to existing conditions Operational use of energy includes the heating, cooling, and lighting of buildings; water heating; operation of electrical systems and plug-in appliances within buildings; parking lot and outdoor lighting; and the transport of electricity, natural gas, and water to the areas where the resource would be consumed. Southern California Edison (SCE) provides electrical power and Southern California Gas Company (SoCalGas) provides natural gas service to the Project area.

Short-Term Construction Impacts

Construction of the Project would require electricity use to power some of the construction-related equipment. The electricity use during construction would vary during different phases of construction, where the majority of construction equipment during grading would be gas-powered or diesel-powered, and the later construction phases would require electricity-powered, such as interior construction and architectural coatings.

Table 10 shows the estimated energy consumption for Project construction.

Table 10. Energy Consumption Estimate for Project Construction.

Construction Phase	Number of Construction Days	Average Worker and Vendor Trips Per Day	Horse Power Hours per Construction Phase	Construction Equipment		Worker and Vendor Trips Gas & Fuel Use (3)
				Energy Use (1)	Gas & Fuel Use (2)	
Site Preparation	2	8	8,002		432.54	17.58
Grading	4	8	13,132		709.84	35.14
Building Const., Paving, Architectural Coating.	220	63	12,770		46,520	15,221.67
			TOTALS	**692.71 kWh**	**47,662.38 Gal.**	**27,686.74 Gal.**

1: Calculation is based on an average construction energy cost of $2.28 per month of energy use per 1,000 square feet of building space
(30,382 s.f.) over the total duration of construction (10-months), at the rate of 8 cents per kilowatt hour (kWh).
2: Calculation is based on expected horsepower (HP) hours and an average factor of 1 gallon of fuel per 18.5 horsepower-hour.
3: Calculation is based on number of expected worker and vendor trips per day, multiplied by an average trip length of 14.7 miles and
based on the average fuel economy of a light duty automobile of 26.77 miles per gallon.
4. This calculation overstates the HP hours per construction phase because it does not apply a load factor.

Since the Project area is already served by onsite electrical infrastructure, adequate electrical infrastructure capacity is available to accommodate the electricity demand during construction would not require additional or expanded electrical infrastructure.

The amount of energy and fuel use anticipated by the Project's construction are typical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive. Project construction equipment would conform to the applicable ARB emissions standards, acting to promote equipment fuel efficiencies. In addition, demand for construction-related electricity and fuels would be spread out over the life of the construction phases of the Project but would not require a permanent commitment of energy or diesel fuel resources for this purpose. Therefore, impacts from energy use during short-term construction activities are less than significant.

Long-Term Operational Impacts

Operation of the Project would create additional demands for electricity as compared to existing conditions, and would result in increased transportation energy use. Operational use of energy would include heating, cooling, and ventilation of buildings; operation of electrical systems, security functions, use of on-site equipment and appliances; and indoor, outdoor, perimeter, and parking lot lighting.

Based on the CalEEMod Outputs (Appendix A), the Project would create a net increase in electricity demand of approximately 340,528 kWh per year. This net increase is well within SCE's system wide net increase in electricity supplies of approximately 15,273 GWh annually over the 2012-2024 period (CEC, Electricity Consumption by County, 2018). Therefore, there are sufficient planned electricity supplies in the region for the estimated net increase in electricity demands, and buildout under the proposed project would not require expanded electricity supplies.

Based on the CalEEMod Outputs (Appendix A), the Project would generate a net increase in natural gas demand of approximately 10.60 KBTU/yr. This net increase is well within the Southern California Gas Company's system wide natural gas supplies of approximately 923 million of therms during the 2018 period. Therefore, there are sufficient planned natural gas supplies in the region for the estimated net increase in natural gas demands, and buildout under the proposed Project would not require expanded natural gas supplies. Additionally, plans submitted for building permits of development projects in the Project area would be required to include verification demonstrating compliance with the 2016 Building and Energy Efficiency Standards and are also required to be reviewed. The Project would also be required adhere to the provisions of CALGreen, which established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.

Conclusion

Even though the Project would increase the consumption of electricity and natural gas resources, the project would not increase demand such that SoCalGas and SCE would need to plan for new regional electricity or natural gas facilities, the construction of which could cause significant environmental effects. Based on the above analysis, the proposed Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation

3.6(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Determination: Less Than Significant Impact.
Source: California Energy Commission.

Impact Analysis

The State of California has established a comprehensive framework for the use of efficient energy. This occurs through the implementation of the Clean Energy and Pollution Reduction Act of 2015 (SB 350), Title 24 Energy Efficiency Standards, and the California Green (CalGreen) Building

Standards (included as PPP 3.6-1). The proposed Project would comply with existing regulations as ensured through the City's permitting process. Thus, construction and operation of the proposed Project would not conflict with or obstruct State or local plans for energy efficiency or renewable energy.

3.7 GEOLOGY AND SOILS

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				■
2) Strong seismic ground shaking?			■	
3) Seismic-related ground failure, including liquefaction?			■	
4) Landslides?				■
b. Result in substantial soil erosion or the loss of topsoil?			■	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-site or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?			■	
d. Be located on expansive soil, as defined in the Uniform Building Code, creating substantial risks to life or property?			■	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				■
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				■

3.6 (a) (1) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Determination: No Impact.

Source: General Plan.

Impact Analysis

According to Figure 10.1 of the City of Loma Linda General Plan Public Health and Safety Element, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known faults underlie the site. Because there are no faults located on the Project site, there is no potential for the Project to expose people or structures to adverse effects related to ground rupture of a known earthquake fault.

3.6 (a) (2) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

Determination: Less Than Significant Impact.

Source: Project Application Materials.

Impact Analysis

The Project site is located in a seismically active area of Southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. This risk is not considered substantially different than that of other similar properties in the southern California area. Structures built in the City of Loma Linda are required to be built in compliance with the California Building Code Regulations, Title 24, Part 2, which contains provisions for earthquake safety based on factors including occupancy type, the types of soils onsite, and the probable strength of the ground motion. Compliance with the California Building Code would include the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structures so that it would withstand the effects of strong ground shaking. Implementation of California Building Code standards would be verified by the City of Loma Department of Building and Safety during the permitting process. Because the proposed Project would be constructed in compliance with the California Building Code, the proposed project would result in a less than significant impact related to strong seismic ground shaking.

3.6 (a) (3) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?

Determination: Less Than Significant Impact.

Source: General Plan Public Health and Safety Element.

Impact Analysis

Liquefaction is a phenomenon in which loose, saturated, relatively cohesion-less soil deposits lose shear strength during strong ground motions. The factors controlling liquefaction are:

- Seismic ground shaking of relatively loose, granular soils that are saturated or submerged can cause soils to liquefy and temporarily behave as a dense fluid. For liquefaction to occur, the following conditions have to occur:

- Intense seismic shaking;
- Presence of loose granular soils prone to liquefaction; and
- Saturation of soils due to shallow groundwater.

According to Figure 10.1 of the City of Loma Linda General Plan Public Health and Safety Element, the Project site is not located within a liquefaction zone.

3.6 (a) (4) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?

Determination: No Impact.
Source: Site Inspection.

Impact Analysis

Generally, a landslide is defined as the downward and outward movement of loosened rock or earth down a hillside or slope. Landslides can occur either very suddenly or slowly, and frequently accompany other natural hazards such as earthquakes, floods, or wildfires. Landslides can also be induced by the undercutting of slopes during construction, improper artificial compaction, or saturation from sprinkler systems or broken water pipes.

The site is relatively flat and contains no slopes that may be subject to landslides. Therefore the site is not considered susceptible to seismically induced landslides. There are no impacts.

3.6(b) Result in substantial soil erosion or the loss of topsoil?

Determination: Less Than Significant Impact.
Source: Project Application Materials,

Note: A comprehensive discussion of erosion can be found in Section 3.9, Hydrology and Water Quality.

Impact Analysis

The Project site is heavily disturbed by human activity. Therefore, the loss of topsoil is not a significant impact.

Construction

During construction, the Project has the potential to contribute to soil erosion and the loss of topsoil. Grading and excavation activities that would be required for the project would expose and loosen topsoil, which could be eroded by wind or water. A Construction General Permit would be obtained and a Storm Water Pollution Prevention Plan (SWPPP) would be prepared prior to construction. Potential impacts would be mitigated for through sediment, erosion, and non-storm

water control methods identified in the SWPPP pursuant to the requirements of the NPDES General Construction Permit. Mandatory implementation of a SWPPP would ensure the Project does not result in significant impacts to water quality due to construction-related activities.

Operations

The Project includes installation of landscaping and paving throughout the project site and areas of loose topsoil that could erode by wind or water would not exist upon operation of the proposed use. In addition, as described in Section X, *Hydrology and Water Quality*, the hydrologic features of the proposed project have been designed to slow, filter, and retain stormwater on the project site, which would also reduce the potential for stormwater to erode topsoil. Furthermore, the Water Quality Management Plan (WQMP) prepared for the project proposes bioretention BMPs to be installed throughout the site in landscaped areas (e.g. on-lot infiltration is proposed via infiltration trenches and lot runoff drains to infiltration BMP prior to discharge into the street/storm drain).

Based on the analysis above, potential impacts related to substantial soil erosion or loss of topsoil would be less than significant with implementation of the mandatory requirements for the preparation of a SWPPP and WQMP.

3.6(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Determination: Less Than Significant Impact.
Source: General Plan Public Health and Safety Element.

Impact Analysis

Landslide

The site is relatively flat and contains no slopes that may be subject to landslides.

Lateral Spreading

Lateral spreading is a term referring to landslides that commonly form on gentle slopes and that have rapid fluid-like flow horizontal movement. Most lateral spreading is caused by earthquakes but it is also caused by landslides. The site is relatively flat and contains no slopes that may be subject to landslides or lateral spreading.

Subsidence

Subsidence is the downward movement of the ground caused by the underlying soil conditions. Certain soils, such as clay soils are particularly vulnerable since they shrink and swell depending on their moisture content. Subsidence is an issue if buildings or structures sink which causes damage to the building or structure. Subsidence is usually remedied by excavating the soil the depth of the underlying bedrock and then recompacting the soil so that it is able to support buildings and

structures. Impacts related to subsidence can be attenuated through compliance with the *California Building Standards Code* and *City Building Code.*

Liquefaction or Collapse

As noted in the response to Issue 3.6 (a) (3) above, the Project site is not located within a liquefaction zone.

Collapse occurs in saturated soils in which the space between individual particles is completely filled with water. This water exerts a pressure on the soil particles that influences how tightly the particles themselves are pressed together. The soils lose their strength beneath buildings and other structures.

Data from the California Department of Water Resources indicates that the depth of groundwater in the project site area is historically greater than 100 feet As such, the Project site's potential for exposure to collapse is considered remote. In addition, the soil composition consists of Hanford sandy loam which is soil type not conducive to collapse.

Based on the analysis above, impacts are considered less than significant for landslides, lateral spreading, subsidence, liquefaction or collapse.

3.6(d) Be located on expansive soil, as defined in the Uniform Building Code, creating substantial risks to life or property?

Determination: Less than Significant Impact.
Source: Project Application Materials.

Impact Analysis

Expansive soils are those that undergo volume changes as moisture content fluctuates; swelling substantially when wet or shrinking when dry. Soil expansion can damage structures by cracking foundations, causing settlement and distorting structural elements. The onsite near surface soils are classified as Hanford Sandy. In general, these soils are considered to possess a low expansion potential.

Based on the analysis above, impacts would be less than significant and no mitigation measures are required.

3.6(e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Determination: No Impact.
Source: Project Application Materials.

Impact Analysis

The Project does not propose the use of septic tanks or alternative waste water disposal systems. The Project would install domestic sewer infrastructure and connect to the City's sewer system. As such, there are no impacts.

3.6(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Determination: No Impact.
Source: Phase I Paleontological Resources Inventory (Appendix C).

Impact Analysis

Paleontological Resources

A comprehensive museum collection records search of the Vertebrate Paleontology Section collections of the San Bernardino County Museum found previously recorded paleontological localities on or near the Project area. There is low potential for locating significant paleontological resources during grading and trenching within the Project site near the soil surface, but potential increases at greater depth below the surface. Because of this potential, the following Mitigation Measure is recommended:

Mitigation Measures

GEO-1: Paleontological Monitoring. A qualified paleontologist (the "Project Paleontologist") shall be retained by the developer prior to the issuance of a grading permit. The Project Paleontologist will be on-call to monitor ground-disturbing activities and excavations on the Project site following identification of potential paleontological resources by project personnel. If paleontological resources are encountered during implementation of the Project, ground-disturbing activities will be temporarily redirected from the vicinity of the find. The Project Paleontologist will be allowed to temporarily divert or redirect grading or excavation activities in the vicinity in order to make an evaluation of the find. If the resource is significant, Mitigation Measure GEO-2 shall apply.

GEO-2: Paleontological Treatment Plan. If a significant paleontological resource(s) is discovered on the property, in consultation with the Project proponent and the City of Loma Linda Community Development Department, the qualified paleontologist shall develop a plan of mitigation which shall include salvage excavation and removal of the find, removal of sediment from around the specimen (in the laboratory), research to identify and categorize the find, curation in the find a local qualified repository, and preparation of a report summarizing the find.

With implementation of Mitigation Measures GEO-1 and GEO-2, impacts are less than significant.

Unique Geologic Features

Unique geologic features are those that are unique to the field of Geology. Unique geologic features are not common in Jurupa Valley. The geologic processes that formed the landforms in Jurupa Valley are generally the same as those in other parts of the state. What makes a geologic unit or feature unique can vary considerably. A geologic feature is unique if it:

- Is the best example of its kind locally or regionally;
- Embodies the distinctive characteristics of a geologic principle that is exclusive locally or regionally;
- Provides a key piece of geologic information important in geology or geologic history;
- Is a "type locality" (the locality where a particular rock type, stratigraphic unit or mineral species is first identified) of a geologic feature;
- Is a geologic formation that is exclusive locally or regionally;
- Contains a mineral that is not known to occur elsewhere in the City; or
- Is used repeatedly as a teaching tool.

The Project site is relatively flat with an elevation of approximately 1,090 feet above mean sea level. The entirety of the Project area soils are mapped as Hanford sandy loam (HbA) (NRCS. Geologic mapping indicates that the project area is underlain by Quaternary young alluvium (Qya3). These features are not considered "unique."

3.7 GREENHOUSE GAS EMISSIONS

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			■	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			■	

3.7(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Determination: Less Than Significant Impact.
Source: California Emissions Estimator Model, Outputs (Appendix A).

Impact Analysis

An individual project cannot generate enough greenhouse gas emissions to influence global climate change. The Project participates in this potential impact by its incremental contribution combined with the cumulative increase of all other sources of greenhouse gas emissions, which when taken together may have a significant impact on global climate change.

A final numerical threshold for determining the significance of greenhouse gas emissions in the South Coast Air Basin has not been established by the South Coast Air Quality Management District. The City of Loma Linda in previous CEQA documents has been using the following as interim threshold for commercial projects proposed by the South Coast Air Quality Management District staff:

1) Generate greenhouse gas emissions that exceeds a screening threshold of 3,000 MTCO2e per year. Projects that emit less stationary source greenhouse gas emissions less than 3,000 MTCO2e per year are not considered a substantial greenhouse gas emitter and the impact is less than significant. Projects that emit in excess of 3,000 MTCO2e per year require additional analysis and mitigation.

A summary of the Project's projected annual operational greenhouse gas emissions, including amortized construction-related emissions, is provided in Table 11.

Table 11. Total Project Greenhouse Gas Emissions (Annual) (Metric Tons Per Year)

Source		GHG Emissions MT/yr		
	N2O	CO2	CH4	CO2e
Mobile Sources	0.000	917.57	0.045	918.70
Area	0.000	0.004	0.00001	0.004
Energy	0.001	114.16	0.005	114.56
Solid Waste	0.000	66.60	3.94	165.00
Water/Wastewater	0.003	19.59	0.13	23.64
30-year Amortized Construction GHG				8.58
TOTAL				*139.81*
SCAQMD Threshold				**3,000**
Exceed Threshold?				**NO**
Source: CalEEMod Outputs (Appendix A).				

As shown in Table 11, the Project is estimated to emit approximately 139.81 MTCO2e per year, including amortized construction-related emissions which is below the threshold used by the City to determine if greenhouse gas emissions are significant. Therefore, impacts are less than significant.

3.7(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Determination: Less Than Significant Impact.

Source: General Plan Conservation and Open Space Element (2009), First Update to the Climate Change Scoping Plan, May 22, 2014.

Impact Analysis

The General Plan Conservation and Open Space Element addresses global climate change with the following Guiding Policy:

"9.8.1 Guiding Policy

Minimize greenhouse gas emissions that are reasonably attributable to the City's discretionary land use decisions and internal government operations, with the goal of reducing Loma Linda's greenhouse gas emissions to 1990 levels by 2020."

Guiding Policy 9.8.1 is consistent with California Assembly Bill 32 which created a comprehensive, multi-year program to reduce greenhouse gas emissions to 1990 levels by 2020, and to maintain and continue reductions beyond 2020.

The Climate Change Scoping Plan was first approved by the California Air Resources Board (CARB) in 2008 and must be updated every five years. The *First Update to the Climate Change Scoping Plan* was approved by the Board on May 22, 2014. The *Climate Change Scoping Plan* provides a

framework for actions to reduce California's GHG emissions, and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. As such, the *Climate Change Scoping Plan* is not directly applicable to the Projects in many cases. The Project is not in conflict with the *Climate Change Scoping Plan* because its individual greenhouse gas emissions are below screening thresholds as noted in the response to Issue 3.7 (a) above and the Project will implement such greenhouse reduction measures Water Efficient Landscaping, Title 24 Energy Efficiency Requirements, and recycling and waste reduction requirements

Based on the analysis above, impacts are less than significant.

3.8 HAZARDS AND HAZARDOUS MATERIALS

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			■	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			■	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			■	
d. Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and, as a result, would it create a significant hazard to the public or the environment?				■
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				■
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			■	
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				■

3.8(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Determination: Less than Significant Impact.

Source: State of California, Project Application Materials.

Impact Analysis

Short-Term Construction Impacts

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the subject property during construction of the Project. This heavy equipment would likely be fueled and maintained by

petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than would occur on any other similar construction site.

Construction contractors would be required to comply with all applicable federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including, but not limited, requirements imposed by the Environmental Protection Agency, the California Department of Toxic Substances Control, the South Coast Air Quality Management District, and the Santa Ana Regional Water Quality Control Board. As such, impacts from construction related activities would be less than significant.

Long-term Operational Impacts

The Project site would be developed as a mixed-use facility that includes an eye surgery center and space for medical offices and retail which are land uses that are not typically associated with the quantities of hazardous not typically that could be associated with upset due to the transport, use, or disposal of significant amounts of hazardous materials. Although the proposed uses may utilize cleaning products that contain toxic substances, such as cleansers, paints, adhesives, and solvents, these products are usually in low concentration and small in amount and would not pose a significant risk to humans or the environment during transport to/from or use at the project site. Any medical waste is required to be handled pursuant to California's Medical Waste Management Act.

With compliance with the mandatory requirements described above, impacts would be less than significant.

3.8(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Determination: Less Than Significant Impact.

Sources: State of California, Project Application Materials.

Impact Analysis

There are several ways in which hazardous materials can be released into the environment through a reasonably foreseeable upset. The following examples include, but are not limited to:

- Floods, earthquakes, or fires that would cause hazardous materials to be released into the environment from tank rupture, pipeline rupture, fumes, or carried by floodwaters.

- Through demolition of older buildings that may contain lead paint, asbestos or other hazardous materials.

- Mistakes in chemical processing that could become volatile and explode causing release of hazardous materials into the environment.

- Through release associated with construction of a project. For example, construction equipment could accidentally release petroleum products in sufficient quantity to pose a hazard to people and the environment.

The Project does not involve the manufacturing or transport of hazardous materials. As such, accidents involving hazardous materials that could pose a significant hazard to the public or the environment would be highly unlikely during the construction and long-term operation of the Project and are not reasonably foreseeable.

The use of hazardous materials on the Project site during construction is a standard risk on all construction sites, and there would be no greater risk for upset and accidents than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including, but not limited, requirements imposed by the Environmental Protection Agency, the California Department of Toxic Substances Control, the South Coast Air Quality Management District, and the Santa Ana Regional Water Quality Control Board. As such, impacts from construction related activities would be less than significant.

Upon build-out, the Project site would operate as a mixed-use facility that includes an eye surgery center and space for medical offices and retail which are land uses that are not typically associated with the quantities of hazardous materials that could be subject to upset or accident involving the release of hazardous materials into the environment.

Based on the analysis above, impacts would be less than significant and no mitigation measures are required.

3.8(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Determination: Less Than Significant Impact.

Sources: Project Application Materials, Google Earth.

Impact Analysis

The Project site is not located within one-quarter mile of an existing or proposed school. The nearest schools are Victoria Elementary School located approximately ½ mile north of the Project site and Loma Linda Academy located approximately ½ mile southwest of the Project site. As discussed in the responses to issues 3.8 (b) and 3.8 (c) above, the Project is a mixed-use facility that includes an eye surgery center and space for medical offices and retail which are land use types not

typically associated with the substantial use of hazardous materials. As such, impacts are less than significant.

3.8(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Determination: No Impact.

Source: DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List).

Impact Analysis

The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

3.8(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?

Determination: Less Than Significant Impact.

Sources: Google Earth, General Plan, Public Health and Safety Element, Airport Layout Plan Narrative Report for San Bernardino International Airport.

Impact Analysis

The Project site is located approximately 1.5 miles south of the San Bernardino International Airport. An Airport Land Use Compatibility Plan has not been adopted for the airport. According to Figure 10.4, Loma Linda General Plan, Public Health and Safety Element, the Project site is located within the San Bernardino International Airport Influence Area.

Based on a report entitled: *Airport Playout Plan Narrative for San Bernardino International Airport, San Bernardino, California,* prepared by Coffman Associates, Inc. and approved by the San Bernardino International Airport Authority on September 22, 2010, airfield design standards as required by the Federal Aviation Administration, show that the Project site is not located in any of the following areas:

- Runway Safety Area
- Object Free Area
- Obstacle Free Zone
- Precision Object Free Area
- Runway Protection Zone

Based on the analysis above, the Project would not result in a safety hazard for people residing or working in the Project area and impacts are less than significant.

3.8(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Determination: Less Than Significant Impact.
Sources: General Plan, Public Health and Safety Element, Project Application Materials.

Impact Analysis

Access to the Project site is proposed from Redlands Boulevard via a right-in and right-out only driveway and Richardson Street via a full access driveway. The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. During construction and long-term operation, the Project would be required to maintain adequate emergency access for emergency vehicles via Redlands Boulevard or Richardson Street and connecting roadways as required by the City. Furthermore, the Project would not result in a substantial alteration to the design or capacity of any public road that would impair or interfere with the implementation of evacuation procedures. Because the Project would not interfere with an adopted emergency response or evacuation plan, impacts are less than significant.

3.8 (h) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Determination: No Impact.
Source: General Plan, Public Health and Safety Element, California Board of Forestry and Fire Protection.

Impact Analysis

According to the Board of Forestry and Fire Protection website accessed on October 22, 2019, the Project site is not located within or near a state responsibility area or lands classified as very high fire hazard severity zone. As such, there is no impact.

3. HYDROLOGY AND WATER QUALITY

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			■	
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			■	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in substantial erosion or siltation on- or off-site;			■	
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;			■	
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of runoff; or			■	
iv. impede or redirect flood flows?			■	
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				■
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				■

3.9(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Determination: Less Than Significant Impact.
Source: Preliminary Water Quality Management Plan (Appendix D).

Impact Analysis

Waste Discharge Requirements

Waste Discharge Requirements (WDRs) are issued by the Santa Ana Regional Board under the provisions of the California Water Code, Division 7 "Water Quality," Article 4 "Waste Discharge Requirements." These requirements regulate the discharge of wastes which are not made to surface waters but which may impact the region's water quality by affecting underlying groundwater basins. Such WDRs are issued for Publically Owned Treatment Works' wastewater reclamation operations, discharges of wastes from industries, subsurface waste discharges such as septic systems, sanitary landfills, dairies and a variety of other activities which can affect water quality.

Water Quality Requirements

The Porter-Cologne Act defines water quality objectives (i.e. standards) as "…the limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses of water or the prevention of nuisance within a specific area" (§13050 (h)).

Construction Impacts

Construction of the Project would involve clearing, grading, paving, utility installation, building construction, and the installation of landscaping, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

Pursuant to the requirements of the Santa Ana Regional Water Quality Control Board and the City of Loma Linda, the Project would be required to obtain a National Pollutant Discharge Elimination System Municipal Stormwater Permit for construction activities. The National Pollutant Discharge Elimination System permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation.

In addition, the Project would be required to comply with the Santa Ana Regional Water Quality Control Board's Santa Ana River Basin Water Quality Control Program. Compliance with the National Pollutant Discharge Elimination System permit and the Santa Ana River Basin Water Quality Control Program involves the preparation and implementation of a Storm Water Pollution Prevention Plan for construction-related activities, including grading. The Storm Water Pollution Prevention Plan would specify the Best Management Practices (BMPs) that the project would be required to implement during construction activities to ensure that all potential pollutants of

concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property.

Operational Impacts

Storm water pollutants commonly associated with the land uses proposed by the Project include pathogens, phosphorous, nitrogen, sediment, metals, oil and grease, trash and debris, pesticides and herbicides, and organic compounds.

Pursuant to the requirements of the City's National Pollutant Discharge Elimination System permit, a Water Quality Management Plan is required for managing the quality of storm water or urban runoff that flows from a developed site after construction is completed and the facilities or structures are occupied and/or operational. The Preliminary Water Quality Management Plan proposes bioretention BMPs to be installed throughout the site in landscaped areas (e.g. on-lot infiltration is proposed via infiltration trenches and lot runoff drains to infiltration BMP prior to discharge into the street/storm drain).

Based on the analysis above, impacts would be less than significant.

3.9(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Determination: Less Than Significant Impact.
Sources: 2015 San Bernardino Valley Urban Water Management Plan, City of Loma Linda Public Works Department.

Impact Analysis

Groundwater Supply Impacts

The primary way a project can deplete groundwater supplies is to exceed the rate of ground-water withdrawal that exceeds the rate of natural recharge ("safe yield'). "Safe yield" is generally defined as the amount of water available for consumption.

The San Bernardino Basin Area was defined by, and adjudicated in gross, by the Western-San Bernardino Judgment (Western Judgment) in 1969. The San Bernardino Basin Area is adjudicated on a safe yield basis. Loma Linda therefore has the opportunity to develop additional wells and over-extract groundwater under specified conditions contained in the stipulated judgment. The wells in general have provided a stable source of water supply. Extensive modeling has been used to examine groundwater recharge, groundwater pumping, basin storage, groundwater flow, and groundwater plume location and plume migration. Based on these studies it is anticipated that groundwater pumping by Loma Linda and other San Bernardino Basin Area users will not be reduced or curtailed during a single-dry or multi-dry year. (Ref. *2015 San Bernardino Valley Urban Water Management Plan, pp. 8-13-14).* Based on the analysis above, the Project is not anticipated to deplete groundwater supplies.

Groundwater Recharge Impacts

The primary way a project can interfere with groundwater recharge is to interfere directly or indirectly with an existing groundwater recharge area that is managed by a local water agency Water purveyors have formal recharge programs where water is delivered to earthen basins called spreading or recharge basins where the water can soak into the ground and ultimately becomes part of the groundwater system. The Project is located in the Bunker Hill basin which is 120 square miles in size. The Project site is 2.0 acres in size and is currently not being used as a formal groundwater recharge area. Therefore, impacts associated with groundwater recharge are less than significant.

3.9(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(c) (i) Result in substantial erosion or siltation on- or off-site?

Determination: Less Than Significant Impact.
Source: Preliminary Water Quality Management Plan (Appendix D).

As noted in the response to Issue 3.9 (a) above, the Project's Storm Water Pollution Prevention Plan would specify the Best Management Practices (BMPs) that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. In addition, the Project's Water Quality Management Plan proposes The Preliminary Water Quality Management Plan proposes bioretention BMPs to be installed throughout the site in landscaped areas (e.g. on-lot infiltration is proposed via infiltration trenches and lot runoff drains to infiltration BMP prior to discharge into the street/storm drain).

Based on the above analysis, with buildout of the Project site, there would be no significant alteration of the site's existing drainage pattern and there would not be any significant increases in the rates of erosion or siltation on or off site. Impacts are less than significant.

(c) (ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite?

Determination: Less Than Significant Impact.
Source: Preliminary Water Quality Management Plan (Appendix D).

Impact Analysis

Storm water runoff will be managed by bioretention BMPs to be installed throughout the site in landscaped areas (e.g. on-lot infiltration is proposed via infiltration trenches and lot runoff drains to infiltration BMP prior to discharge into the street/storm drain).

Based on the analysis above, with buildout of the Project site, there would be no significant alteration of the site's existing drainage pattern and there would not be any significant increases in flooding on or off-site. Impacts are less than significant.

(c) (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of runoff?

Determination: Less than Significant Impact.
Source: Preliminary Water Quality Management Plan (Appendix D).

Impact Analysis

Storm water runoff will be managed by bioretention BMPs to be installed throughout the site in landscaped areas (e.g. on-lot infiltration is proposed via infiltration trenches and lot runoff drains to infiltration BMP prior to discharge into the street/storm drain).

Based on the analysis above, impacts would be less than significant and no mitigation measures are required.

(c) (iv) Impede or redirect flood flows?

Determination: Less Than Significant Impact.
Sources: Preliminary Water Quality Management Plan (Appendix D).

Impact Analysis

There are no conditions associated with the proposed Project that could result in the substantial degradation of water quality beyond what is described above in Responses3.9 (a), 3.9(c), and3.9 (e) above.

Based on the analysis above, impacts would be less than significant.

3.9(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Determination: Less Than Significant Impact.
Sources: FEMA, California Department of Conservation, Google Earth.

Impact Analysis

The Project site is located within FEMA Zone X (per FEMA National Flood Hazard Map 06071C8684J) and is not subject to flooding.

According to the California Department of Conservation, California Official Tsunami Inundation Maps the site is not located within a tsunami inundation zone.

Seismic seiches are standing waves set up on rivers, reservoirs, ponds, and lakes when seismic waves from an earthquake pass through the area. The project site is not located in close proximity to a river, reservoir, pond, or lake and will not be at risk from seiche.

3.9(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Determination: Less Than Significant Impact.
Sources: Preliminary Water Quality Management Plan (Appendix D), Project Application Materials.

Impact Analysis

The Project is within the jurisdiction of the Santa Ana Water Regional Quality Control Board. The Santa Ana Regional Quality Control Board adopted the Santa Ana Region Basin Plan which designates beneficial uses for all surface and groundwater within their jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As summarized below, the Project would comply with the applicable National Pollutant Discharge Elimination System permits and implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff.

As discussed in Response 3.9(ci), during construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported via stormwater runoff into receiving waters. However, the proposed Project would be required to comply with the mandatory requirements set forth by the City Municipal Code, which requires preparation of a Stormwater Pollution Prevention Plan and implementation of construction Best Management Practices to control stormwater runoff and discharge of pollutants.

A Final Water Quality Management Plan would be prepared for the Project in compliance with the City's Municipal Code. The Final Water Quality Management Plan will detail the Source Control, Site Design, and Low Impact Development Best Management Practices that would be implemented to treat stormwater runoff and reduce impacts to water quality during operation. The proposed Low Impact Development Best Management Practices include proprietary biofiltration best management practices. These Best Management Practices would capture and treat stormwater runoff and reduce pollutants of concern in stormwater runoff.

The Project would comply with the applicable National Pollution Discharge Elimination System permits and implement construction and operational Best Management Practices to reduce pollutants of concern in stormwater runoff so that the project would not degrade water quality, cause the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters. As such, the Project would not result in water quality impacts that would conflict with the Regional Water Quality Control Board's Santa Ana Region Basin Plan. Impacts related to conflict with a water quality control plan would be less than significant, and no mitigation is required.

In addition, as discussed in Response 3.9(b), the Project site is not located within a groundwater recharge area. Therefore, the Project is not located in an area covered by a sustainable groundwater management plan or in an area where a sustainable groundwater management plan will be developed. Thus, the Project would not conflict with or obstruct the implementation of a sustainable groundwater management plan, and no mitigation is required.

3.10 LAND USE AND PLANNING

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?				■
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			■	

3.10(a) Physically divide an established community?

Determination: No Impact.
Source: Google Earth, Site Inspection.

Impact Analysis

An example of a project that has the potential to divide an established community includes the construction of a new freeway or highway through an established neighborhood. The Project site is 2.0 acres in size and is located in a developed area. The site is bordered by a truck service facility development to the north, Redlands Boulevard followed by a mobile home park to the south, Richardson Street followed by vacant land to the east, and a motel to the west. Therefore, no impacts would occur with respect to dividing an established community.

3.10(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Determination: Less Than Significant Impact.
Sources: General Plan, South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Project Application Materials.

Impact Analysis

The General Plan land use designation for the Project site is Commercial and the zoning classification is East Valley Corridor Specific Plan / General Commercial (EVC-CG). The land use proposed by the Project is consistent with both the *General Plan* designation and zoning classification.

In addition, as demonstrated throughout this Initial Study/Mitigated Negative Declaration, the Project would otherwise not conflict with any applicable goals, objectives, and policies of the City of General Plan or the City of Loma Linda Municipal Code. Additionally, the Project would not conflict with any applicable policy document whose purpose is to avoid or mitigate an environmental effect.

3.11 MINERAL RESOURCES

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				■
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				■

3.11(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Determination: No Impact.
Source: General Plan.

Impact Analysis

No mineral resource extraction activity is known to have ever occurred on the Project site. According to the California Department of Conservation, Division of Mines and Geology, the Project site and surrounding area are designated Mineral Resource Zone 3 (MRZ-3). This designation is given for areas containing mineral deposits; the significance of which cannot be evaluated from available data due to urbanization. The Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State because the site is currently vacant, located within an urbanized area, and has limited accessibility for mining.

3.11(b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Determination: No Impact.
Sources: General Plan Land Use Map and Zoning Map.

Impact Analysis

The General Plan land use designation for the Project site is Commercial and the zoning classification is East Valley Corridor Specific Plan / General Commercial (EVC-CG). Neither of these designations allow for mineral resource extraction. Therefore, the Project will not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

3.12 NOISE

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		■		
b. Generation of excessive groundborne vibration or groundborne noise levels?			■	
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?			■	

3.12(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Determination: Less Than Significant Impact With Mitigation Incorporated.
Sources: General Plan, Municipal Code, Project Application Materials.

Impact Analysis

Based on Guidelines for the Implementation of the California Environmental Quality Act, Appendix G, Public Resource Code Sections 15000–15387, a project will normally have a significant effect on the environment related to noise if it will substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and the goals of the community in which it is located. As determined in the *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369 (CBIA) case the California Supreme Court determined that CEQA does not generally require an Initial Study to analyze impacts of the existing environmental conditions on the future occupants of a proposed project and generally only requires an analysis of the proposed project's impact on the environment. Therefore, the following analysis only focuses on the noise generated by the Project and not noise impacts to the Project caused by nearby uses or roadways.

Noise Standards

The applicable noise standards governing the Project site are the criteria in the City Noise Element of the General Plan and its Noise Ordinance.

General Plan and Noise Ordinance Standards

Table 12 below is based on Table 7.C of the City's General Plan and summarizes General Plan policies and City Noise Ordinance standards related to land use and acceptable noise levels applicable to the Project and its impacted surroundings which are based on the California Office of Noise Control Community Compatibility Matrix. These standards are determined to be performance guidelines that provide a decibel range for the City to follow and to help determine what type of noises are nuisances and are unacceptable to the community.

Table 12: City of Loma Linda Noise Level Standards Energy Average

Land Use Categories	Energy Average CNEL			
	Normally Acceptable(1)	Conditionally Acceptable(2)	Normally Unacceptable(3)	CNEL Clearly Unacceptable(4)
Residential	55	70	75	76 or more
Residential (10:00 p.m. to 7:00 p.m.)	< 50	55 or more	----	----
Schools, Libraries, Churches, Hospitals, Nursing Homes	70	70	80	81 or more
Office Buildings, Business Commercial and Professional	70	75	76 or more	----

Source: Chapter 9.20 Loma Linda Municipal Code

INTERPRETATION

(1) Specified land use activities that are satisfactory based upon the assumption that any land use or buildings involved are of ordinary performance standards.

(2) Activities or Actions shall be undertaken only after a detailed analysis of the noise reduction (muffling) requirements is made and noise reduction insulation features are included as a preventive measure.

(3) Noise levels exceeding the following ranges shall generally be discouraged. If new activities or actions proceed, a detailed analysis of the noise reduction requirements must be made and necessary noise insulation features included in the design.

(4) Activities shall not be undertaken or permitted.

Overview of the Existing Ambient Noise Environment

According to the *General Plan Noise Element*, automobiles, buses, trucks and trains dominate transportation noise in Loma Linda. Bus service is provided on major streets, collectors, and local streets within the Loma Linda circulation system. Measurements have shown that background noise levels on "quieter" major streets in Loma Linda are near 60 dBA while the "noisier" streets are about 65 dBA at the nearest residences. An increase of 3 dB is generally considered the threshold level at which people complain that their noise quality has become noticeably degraded. Major transportation noise sources in the City of Loma Linda include traffic on I-10, Redlands Boulevard, Barton Road, Anderson Street, Mountain View Avenue, and Mission Road and trains on the UPRR lines. Based on this information, the primary existing noise sources in the Project area are Redlands Boulevard and Richardson Street.

Short-term Construction Noise Impact Analysis

The most significant source of short-term noise impact is related to noise generated during construction activities on the Project site which would result in potential noise impacts to nearby receptors located to the north (truck service facility) and west (motel) of the Project site. Construction is performed in discrete steps, each of which has its own mix of equipment and consequently its own noise characteristics. Thus noise levels will fluctuate depending upon construction phase, equipment type, duration of equipment use, distance between the noise source and receptor, and the presence or absence of noise attenuation structures. As shown on Table 13 below, noise levels generated by heavy construction equipment (i.e. earthmoving equipment) can range from approximately 75 dBA to 90 dBA when measured at 50 feet.

Table 14. Typical Construction Equipment Noise Levels

Type of Equipment	Range of Sound Levels Measured (dBA at 50 feet)
Pile Drivers	81 to 96
Rock Drills	83 to 99
Jack Hammers	75 to 85
Pneumatic Tools	78 to 88
Pumps	68 to 80
Dozers	85 to 90
Tractors	77 to 82
Front-End Loaders	86 to 90
Graders	79 to 89
Air Compressors	76 to 86
Trucks	81 to 87
Source: "Noise Control for Buildings and Manufacturing Plants", Bolt, Beranek & Newman, 1987, as cited in the General Plan EIR	

However, these noise levels diminish with distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 75 dBA for a jack hammer measured at 50 feet from the noise source to the receptor would be reduced to 69 dBA at 100 feet from the source to the receptor, and would be further reduced to 63 dBA at 200 feet from the source to the receptor.

Two types of short-term noise impacts could occur during the construction of the proposed Project. First, construction crew commutes and the transport of construction equipment and materials to the site for the proposed Project would incrementally increase noise levels on access roads leading to the site. Although there would be a relatively high single event noise exposure potential causing intermittent noise nuisance (passing trucks at 50 feet would generate up to a maximum of 87 dBA), the effect on longer term (hourly or daily) ambient noise levels would be small. Therefore, short-term construction-related impacts associated with worker commute and equipment transport to the Project site would be less than significant.

The second type of short-term noise impact is related to noise generated during excavation, grading, and building erection on the Project site. Construction is completed in discrete steps, each of which has its own mix of equipment, and consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site, and therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

The site preparation phase, which includes excavation and grading of the site, tends to generate the highest noise levels because the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery such as backfillers, bulldozers, draglines, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings.

Construction of the proposed Project is expected to require the use of heavy-duty construction equipment such as earthmovers, bulldozers, and water and pickup trucks. Based on the information in Table 14, the maximum noise level generated by each scraper on the proposed Project site is assumed to be 84 dBA at 50 feet from the scraper. Each bulldozer would also generate 82 dBA at 50 ft. The maximum noise level generated by water and pickup (flatbed) trucks is approximately 74 dBA at 50 feet from these vehicles. Each doubling of the sound sources with equal strength increases the noise level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, the worst-case combined noise level during this phase of construction would be 87 dBA at a distance of 50 feet from the active construction area.

The motel and truck servicing facility would be potentially exposed to construction noise up to 87 dBA which exceeds the City threshold 70 dBA. The mobile home park could be exposed to noise levels up to 75 dBA. Therefore, the following mitigation measure is required.

MM (Mitigation Measure)

NOI-1 Prior to the issuance of a grading permit and building permit, the following notes shall be included on grading plans and building plans:

> ***"a) All construction activities shall comply with Chapter 9.0 (Noise Regulations) of the Municipal Code, including but not limited to the requirement that must be limited to the hours of 7 a.m. to 8 p.m., Monday through Friday. Major construction may not take place during weekends or holidays. Minor activities may be permitted on weekends and holidays.***
>
> ***b) Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards.***
>
> ***c) All stationary construction equipment shall be placed in such a manner so that emitted noise is directed away from any sensitive receptors adjacent to the Project site.***
>
> ***d) Construction equipment staging areas shall be located the greatest distance between the staging area and the nearest sensitive receptors. "***

With implementation of Mitigation Measure NOI-1, construction-related noise impacts from the proposed Project are less than significant.

Operational Noise Impacts

Potential long-term noise impacts would be associated with stationary sources proposed on the Project site. Stationary noise sources from the proposed Project would include noise generated from on-site truck delivery, loading and unloading activities, heating, ventilation, and air conditioning (HVAC) noise, and parking lot activity noise. Further discussion on the potential long-term noise impacts from stationary noise sources are discussed below.

Truck Delivery and Truck Loading/Unloading Activities

Based on the Noise and Vibration Impact Analysis for a 36,590 square foot medical building located at 25915 Barton Road in the City of Loma Linda, truck delivery and loading/unloading activities (including forklift) operations would generate a noise level of 75 dBA Leq at 50 ft. As such, noise from truck delivery and truck loading/unloading activities would be within the "conditionally acceptable" range of 75 dBA required by the City's General Plan. Impacts are less than significant.

Heating, Ventilation, and Air Conditioning (HVAC) Noise

Based on the Noise and Vibration Impact Analysis for a 46,718 square foot commercial building bounded by Mountain View Avenue to the east, the Interstate 10 (I-10) eastbound off ramp to the north, and Rosewood Avenue to the south in the City of Loma Linda, rooftop HVAC equipment could generate noise levels ranging from 64.7 dBA Leq at 5 feet based on reference noise measurements. It is assumed that, as a worst-case scenario, HVAC equipment would operate 24 hours per day. As such, noise from the HVAC equipment would be within the "normally acceptable" range of 70 dBA required by the City's General Plan. Impacts are less than significant.

Parking Lot Activities

Based on the Noise and Vibration Impact Analysis for a 46,718 square foot commercial building bounded by Mountain View Avenue to the east, the Interstate 10 (I-10) eastbound off ramp to the north, and Rosewood Avenue to the south in the City of Loma Linda, parking activities (e.g., employees conversing or doors slamming) would generate approximately 60 to 70 dBA Lmax at 50 feet. As such, noise from the parking lot would be within the "normally acceptable" range of 70 dBA required by the City's General Plan. Impacts are less than significant.

Long-Term Traffic Noise Impacts

The primary source of noise generated by the Project will be from the vehicle traffic generated by the vehicle ingress and egress to the Project site. General Plan Guiding Policy 7.8.1.1.d states: *"Where new development (including construction and improvement of roadways) is proposed in areas exceeding the noise levels identified in the General Plan, or where the development of proposed uses could result in an increase of more than 3.0 dBA above existing background noise, require a detailed noise attenuation study prepared by a qualified acoustical engineer to determine and incorporate appropriate mitigation into project design and implementation to reduce potential noise levels to acceptable noise levels as identified in the General Plan."*

Based on the Traffic Impact Analysis prepared for the Project (Appendix E), the Project is anticipated to generate a net total of approximately 826 trip-ends per day with 55 AM peak hour trips and 83 PM peak hour trips. Typically, a doubling of traffic volumes is required to result in an increase of 3 dBA, which is considered to be a barely audible change. Based on the Traffic Impact Analysis prepared for the Project (Appendix E), 2019 daily traffic volumes on Redlands Boulevard are 20,600 trips and 600 trips on Richardson Street. As such, the proposed Project traffic would not result in a doubling of traffic volumes resulting in a substantial permanent increase in ambient roadway noise levels. Therefore, off-site transportation-related noise impacts created by the Project are less than significant.

3.12(b) Generation of excessive groundborne vibration or groundborne noise levels?

Determination: Less Than Significant Impact.
Sources: General Plan, Municipal Code, Project Application Materials.

Impact Analysis

Construction Vibration

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is expected that ground-borne vibration from construction activities most likely to cause vibration impacts are:

Heavy Construction Equipment: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.

Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes.

The City of Loma Linda has relied upon vibration standards promulgated by Caltrans in past CEQA documents. According to Caltrans, the threshold at which there may be a risk of architectural damage to normal houses with plastered walls and ceilings is 0.20 PPV inch/second. Primary sources of vibration during construction would be bulldozers. A large bulldozer could produce up to 0.089 PPV at 25 feet. At a distance of 15 feet a bulldozer would yield a worst-case 0.027 PPV (inch/sec) which is within the threshold of perception and below any risk or architectural damage.

The closest receptors are the motel to the west and the truck servicing facility to the north. Construction vibration level of vibration would not exceed 0.20 PPV inch/second to these receptors. As such, construction vibration would not result in the excessive groundborne vibration or groundborne noise levels.

Operational Vibration

Typically, groundborne vibration sources that could potentially affect nearby properties are from rail roads and trucks traveling at higher speeds on freeways and highways. The Project does not have rail access nor is it a major transportation facility or roadway. Therefore, the operational impacts associated with ground-borne vibration are less than significant.

3.12 (c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?

Determination: No Impact.

Sources: General Plan, Technical Memorandum San Bernardino International Airport - Eastgate Air Cargo Facility – Aircraft Noise Contour Development.

Impact Analysis

As determined in the *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369 (CBIA) case the California Supreme Court determined that CEQA does not generally require an Initial Study to analyze impacts of the existing environmental conditions on the future occupants of a proposed project and generally only requires an analysis of the proposed project's impact on the environment. Therefore, the following analysis only focuses on the noise generated by the Project and not noise impacts to the Project caused by the San Bernardino International Airport. The analysis below is provided for informational purposes.

The Project site is located approximately 1.5 miles south of the San Bernardino International Airport. An Airport Land Use Compatibility Plan has not been adopted for the airport. According to Figure 10.4, Loma Linda General Plan, Public Health and Safety Element, the Project site is located within the San Bernardino International Airport Influence Area.

According to the Technical Memorandum, San Bernardino International Airport - Eastgate Air Cargo Facility – Aircraft Noise Contour Development, July 3, 2019, the Project site is located outside the CNEL 65 noise contour. In accordance with FAA Order 1050.1F, a significant aircraft noise impact results when the Proposed Project would increase aircraft noise exposure by CNEL 1.5 dB or more for a noise sensitive land use that is exposed to noise at or above CNEL 65. As such, the Project would not expose people residing or working in the project area to excessive noise levels.

3.13 POPULATION AND HOUSING

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			■	
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				■

3.13(a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Determination: Less than Significant Impact.
Source: Project Application Materials.

Impact Analysis

The Project would not directly result in population growth because it does not propose any residential dwelling units. The Project proposes a 30,382 square foot mixed-use facility to include an eye surgery center and space for medical offices and retail to serve the needs of local residents and the surrounding region. A project of this type and size will not create an additional need for housing thus increasing the overall population of the City.

Typically, population growth would be considered a significant impact pursuant to CEQA if it directly or indirectly affects the ability of agencies to provide needed public services and requires the expansion or new construction of public facilities and utilities.

Water and sewer service to the Project site will be provided by the City of Loma Linda. Water and sewer service is available to serve the site from existing water and sewer lines in Redlands Boulevard. No utility extensions or new roadways are required to serve the Project site. In addition, the Project site is located in a developed area of the City so it would not induce population growth by extending infrastructure into an undeveloped area.

Based on the analysis above, impacts are less than significant.

3.13(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Determination: No Impact.
Source: Project Application Materials.

Impact Analysis

The Project would not displace substantial numbers of existing people or existing housing units, or require the construction of replacement housing, as no housing units exist on the site. There is no impact.

3.14 PUBLIC SERVICES

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?			■	
2) Police protection?			■	
3) Schools?			■	
4) Parks?			■	
5) Other public facilities?			■	

3.14(a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

FIRE PROTECTION

Determination: Less Than Significant Impact.
Sources: General Plan Public Services and Facilities Element, *Loma Linda Fire Department.*

Impact Analysis

The Loma Linda Fire Department provides fire protection services to the Project area. The Project would be primarily served by Fire Station 251, an existing station located approximately 1.9 roadway miles southwest of the Project site at 11325 Loma Linda Drive. According to the General Plan Public Services and Facilities Element, the City has established a response goal of a five-minute response time (including three-minute running time) to be maintained for 80 percent of emergency fire, medical, and hazardous materials calls on a citywide response area basis. Although the proposed Project will introduce new development, such development will not be introduced into an area that is not currently being served by the Fire Department, and as such, would not impede the

Fire Department from meeting its established response goal given the Project site's proximity to the Fire Station 251.

Development of the Project would impact fire protection services by placing an additional demand on existing Loma Linda Fire Department resources. To offset the increased demand for fire protection services, the Project would be conditioned by the City to provide a minimum of fire safety and support fire suppression activities, including compliance with State and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access routes.

Furthermore, the Project would be required to comply with the provisions of the City's Development Impact Fee Ordinance, which requires a fee payment to assist the City in providing for fire protection services. Payment of the Development Impact Fee would ensure that the Project provides fair share funds for the provision of additional public services, including fire protection services, which may be applied to fire facilities and/or equipment, to offset the incremental increase in the demand for fire protection services that would be created by the Project.

Based on the analysis above, the construction of new or expansion of current Fire Department facilities will not be required. Therefore, impacts associated with fire protection are less than significant.

POLICE PROTECTION

Determination: Less Than Significant Impact.
Sources: General Plan Public Services and Facilities Element, *San Bernardino County Sheriff's Department.*

Impact Analysis

The San Bernardino County Sheriff's Department provides community policing to the project area via the Central Headquarters located at 655 East Third Street in the City of San Bernardino. The Central Station is located 6.45 roadway miles from the Project site. According to the General Plan Public Services and Facilities Element, the City has set a response goal of a 3.25-minute response time from the time of dispatch. It should be noted that primary response to the proposed Project site would be patrol vehicles located throughout the City and in the immediate area. Therefore, response time to calls for service may vary depending on their location at time of dispatch.

Although the proposed Project will introduce new development into the Project area, such development will not occur in an area that is not currently being served by the Sheriff's Department. Therefore, the proposed Project would not impede the Sheriff's Department from meeting its established response goal.

Based on the analysis above, the construction of new or expansion of current Sheriff's Department facilities will not be required. Therefore, impacts associated with police protection are less than significant.

SCHOOLS

Determination: Less Than Significant Impact.

Sources: California Senate Bill 50 (Greene), Project Application Materials.

Impact Analysis

The Project proposes a 30,382 square foot mixed-use facility to include an eye surgery center and space for medical offices and retail to serve the needs of local residents and the surrounding region. A project of this type and size of this size will not create an additional need for housing thus directly increasing the overall population of the City and generating additional students to be served by the Redlands Unified School District. However, the Project would be required to contribute fees to the Redlands Unified School District in accordance with the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50). Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation under CEQA for project-related impacts to school services.

Based on the above analysis, impacts related to schools are less than significant.

PARKS

Determination: Less Than Significant Impact.

Source: Project Application Materials.

Impact Analysis

The Project proposes a 30,382 square foot mixed-use facility to include an eye surgery center and space for medical offices and retail to serve the needs of local residents and the surrounding region. A project of this type and size of this size will not create an additional need for housing thus directly increasing the overall population of the City and generating the additional need for parkland.

Based on the above analysis, impacts related to parks are less than significant.

OTHER PUBLIC FACILITIES

Determination: Less Than Significant Impact.

Source: Project Application Materials.

Impact Analysis

As noted above, development of the Project would not result in a direct increase in the population of the City and would not increase the demand for public services, including public health services and library services which would require the construction of new or expanded public facilities.

The Project would be required to comply with the provisions of the City's Development Impact Fee Ordinance, which requires a fee payment to assist the City in providing public services. Payment of the Development Impact Fee would ensure that the project provides fair share of funds for

additional public services. These funds may be applied to the acquisition and/or construction of public services and/or equipment.

Based on the above analysis, impacts related to other public facilities are less than significant and no mitigation measures are required.

3.15 RECREATION

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			■	
b. Does the Project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?			■	

Impact Analysis

3.15(a) Would the proposed Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Determination: Less than Significant Impact.
Source: Project Application Materials.

Impact Analysis

The Project proposes a 30,382 square foot mixed-use facility to include an eye surgery center and space for medical offices and retail to serve the needs of local residents and the surrounding region. A project of this type and size will not significantly increase the use of existing public park facilities and would not require the modification existing parks or modification of new park facilities offsite because the Project does not proposes residential dwelling units which create a demand for parks or other recreational facilities.

Based on the above analysis, impacts related to recreational facilities would be less than significant.

3.15(b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?

Determination: Less than Significant Impact.
Source: Project Application Materials.

Impact Analysis

The Project is a mixed-use medical office and retail building and only proposes some exercise stations within some landscaped areas. The installation of the above described facilities as proposed by the Project would result in physical impacts to the surface and subsurface of the Project site. These impacts are considered to be part of the Project's construction phase and are evaluated throughout this Initial Study/Mitigated Negative Declaration. In instances where

significant impacts have been identified, mitigation Measures have been required to reduce impacts to less-than-significant levels. In addition, no offsite parks or recreational improvements are proposed or required as part of the Project. Based on the analysis above, impacts would be less than significant.

3.16 TRANSPORTATION/TRAFFIC

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?		■		
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?			■	
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			■	
d. Result in inadequate emergency access?			■	

3.16(a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Determination: Less Than Significant Impact With Mitigation Incorporated
Source. Traffic Impact Analysis (Appendix E).

Motor Vehicle Analysis

Study Intersections

The following study intersections were evaluated.

Table 17. Traffic Study Intersection Locations

ID No.	Intersection Location	Jurisdiction	Congestion Management Program Roadway?
1	Tippecanoe Av./Anderson St. & Redlands Bl.	Loma Linda	No
2	Poplar St. & Redlands Bl.	Loma Linda	No
3	Driveway 1 & Redlands Bl.	Loma Linda	No
4	Richardson St. & Driveway 2	Loma Linda	No
5	Richardson St. & Redlands Bl.	Loma Linda	No
6	Mountain View Av. & Redlands Bl.	Loma Linda	No
Source: Traffic Impact Analysis, (Appendix E).			

Significance Thresholds

In 2006, the City of Loma Linda voters passed Ballot Measure V, which amended the City's General Plan by the addition of a new growth management element. Accordingly, Chapter 2A was incorporated into the General Plan. Principle Six of the Growth Management Element states:

Traffic levels of service throughout the City of Loma Linda shall be maintained at current levels and new development shall be required to fully mitigate any impact on traffic resulting from the development.

Further clarification is provided in subsection 2. *Levels of Service throughout the City Shall Be Maintained,* under Principle Six, as follows:

To assure the adequacy of various public services and to prevent degradation of the quality of life experience by the resident of Loma Linda, all new development projects shall assure by implementation of appropriate mitigation measures that, at a minimum, traffic levels of service (LOS) are maintained at a minimum of LOS C throughout the City, except where the current level of service is lower than LOS C. In any location where the level of service is below LOS C at the time an application for development project is submitted, mitigation measures shall be imposed on that development project to assure, at a minimum, that the level of traffic service is maintained at levels of service that are no worse than those existing at the time an application for development is filed. In any location where the Level of Service is LOS F at the time an application for a development project is submitted, mitigation measures shall be imposed on that development project to assure, at a minimum, that the volume to capacity ratio is maintained at a volume to capacity ratio that is no worse than that existing at the time an application for development is filed. Projects where sufficient mitigation to achieve the above stated objectives is infeasible shall not be approved unless and until the necessary mitigation measures are identified and implemented.

It should be noted that Measure V LOS standards only apply to intersections and roadways that are within the public right-of-way. Therefore, the two (2) project driveways are not subject to Measure V. LOS is described in Table 18 below.

Table 18. Level of Service Criteria for Unsignalized and Signalized Intersections

Level of Service	Unsignalized Intersection Average Delay per Vehicle (sec.)	Signalized Intersection Average Delay per Vehicle (sec.)
A	< 10	< 10
B	> 10 and < 15	10 and < 20
C	> 15 and < 25	> 20 and < 35
D	> 25 and < 35	> 35 and < 55
E	35 and < 50	> 55 and < 80
F	> 50	> 80
Source: Transportation Research Board Special Report 209, Highway Capacity Manual (HCM).		

Traffic Scenarios Analyzed

The traffic analysis analyzes the following scenarios:

1) Existing

2) Existing Plus Project

3) Opening Year Cumulative (2020) Without Project

4) Opening Year Cumulative (2020) With Project

Trip Generation

The trip generation rates utilized for the purposes of this analysis are based upon data collected by the Institute of Transportation Engineers (ITE) and presented in ITE's most recent edition of *Trip Generation*, (10th Edition, 2017). The Project is anticipated to generate a net total of approximately 826 trip-ends per day with 55 AM peak hour trips and 83 PM peak hour trips.

Scenario #1: Existing

The following intersections are currently operating at an unacceptable LOS (LOS D or worse):

• Tippecanoe Av./Anderson St. & Redlands Bl. (#1) – LOS D PM peak hour only
• Mountain View Av. & Redlands Bl. (#6) – LOS D PM peak hour only

However, the City of Loma Linda states the minimum LOS is LOS C throughout the City, except where the current LOS is below LOS C. As such, the minimum LOS is assumed to be LOS D for the aforementioned intersections. Impacts are less than significant.

Scenario #2: Existing Plus Project

The following intersections are currently operating below at an unacceptable LOS (LOS D or worse):

• Tippecanoe Av. /Anderson St. & Redlands Bl. (#1) – LOS D PM peak hour only
• Mountain View Av. & Redlands Bl. (#6) – LOS D PM peak hour only

However, the City of Loma Linda states the minimum LOS is LOS C throughout the City, except where the current LOS is below LOS C. As such, the minimum LOS is assumed to be LOS D for the aforementioned intersections and no intersections were found not to be significantly impacted by the Project.

Scenario #3: Opening Year Cumulative (2020) Without Project

The following study area intersection is anticipated to operate at an unacceptable LOS under Opening Year Cumulative (2020) Without Project traffic conditions during one or both peak hours:

• Mountain View Av. & Redlands Bl. (#6) – LOS E PM peak hour only

However, the City of Loma Linda states the minimum LOS is LOS C throughout the City, except where the current LOS is below LOS C. As such, the minimum LOS is assumed to be LOS D for the aforementioned intersections and this intersection was found not to be significantly impacted by the Project.

Scenario #4: Opening Year Cumulative (2020) With Project

The following intersection was found to be impacted by Project for Opening Year Cumulative (2020) traffic conditions:

- Mountain View Av. & Redlands Bl. (#6)

The Project will have an incremental cumulative impact to this intersection and the following mitigation measure is required:

Mitigation Measure

TRAN-1. Prior to the issuance of a building permit, the proposed Project shall contribute on a fair share basis (4.4%), through an adopted traffic impact fee program, in the implementation of the recommended intersection lane improvements or freeway improvements, or in dollar equivalent in lieu mitigation contributions, or in the implementation of additional capacity on parallel routes to offset potential impacts to study area intersections. Such actions shall be consistent with the needed improvements for study area intersections as provided in the Traffic Impact Analysis prepared for the proposed project, and the improvement cost and project cost shares at the Year 2020 intersection improvement locations as provided in the Traffic Impact Analysis.

Transit Service Analysis

The Project area is currently served by the Omnitrans, a public transit agency serving the City of Loma Linda. Route 8 runs along Redlands Boulevard and serves the Project area. The Project is not proposing to construct any improvements will interfere with the existing bus service. As such, the Project as proposed will not conflict with an applicable plan, ordinance or policy applying to transit services.

Bicycle & Pedestrian Facilities Analysis

The Project is not proposing to construct any improvements that will interfere with bicycle and pedestrian use. Pedestrian access will be available from the existing sidewalks on Redlands Boulevard and Richardson Street. Therefore, the Project will not conflict with an applicable plan, ordinance or policy applying to non-motorized travel. Impacts are less than significant.

3.16 (b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

Determination: No Impact.
Source: CEQA Guidelines.

Impact Analysis

CEQA Guidelines Section 15064.3 (b) describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. For purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.

> *Note: On September 27, 2013, SB 743 was signed into law. SB 743 fundamentally changed the way the transportation impact analysis as part of CEQA compliance is conducted. Automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment. There will be an opt-in period until July 1, 2020. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide. To date, the City of Loma Linda has not adopted a VMT threshold. As such, this threshold is not applicable to the Project.*

3.16(c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Determination: Less Than Significant Impact.
Source: Project Application Materials.

Impact Analysis

The Project is proposing access to the site as follows:

1) A right-in/right-out only driveway on Redlands Boulevard
2) A second driveway providing full access on Richardson Street

The construction of the driveways are required to meet City Standards. As such, the Project will not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections).

The Project is proposing to construct a mixed-use medical office and retail building in an area that is primarily developed with commercial and residential uses. As such, the Project will not increase hazards due to introducing incompatible uses (e.g., farm equipment) to the area. Impacts are less than significant.

3.16(c) Result in inadequate emergency access?

Determination: Less Than Significant Impact.
Source: Project Application Materials.

Impact Analysis

The Project would result in new medical office and retail uses, which would increase the need for emergency access to-and-from the site. Adequate emergency access would be provided to the Project site from Redlands Boulevard and Richardson Street. During the course of the required review of the Project, the Project's transportation design was reviewed by the City's Engineering Department, County Fire Department, and County Sheriff's Department to ensure that adequate access to and from the site would be provided for emergency vehicles. Impacts are less than significant.

3.17 TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?				■
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		■		

3.17(a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Determination: No Impact.

Source: Phase I Cultural Resources Inventory (Appendix B).

Historic resources generally consist of buildings, structures, improvements, and remnants associated with a significant historic event or person(s) and/or have a historically significant style, design, or achievement. Damaging or demolition of historic resources is typically considered to be a significant impact. Impacts to historic resources can occur through direct impacts, such as destruction or removal, and indirect impacts, such as a change in the setting of a historic resource.

CEQA Guidelines §15064.5(a) clarifies that historical resources include the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.

2. A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements [of] section 5024.1(g) of the Public Resources Code.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

Based on the results of a records search completed at the SCCIC and a pedestrian survey, no known historical resources pursuant to CEQA are located on the Project site.

3.17(b A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Determination: Potentially Significant Impact With Mitigation Incorporated.
Source: AB 52 Consultation.

Impact Analysis

Tribal Cultural Resources are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also created a process for consultation with California Native American Tribes in the CEQA process. Tribal Governments can request consultation with a lead agency and give input into potential impacts to tribal cultural resources before the agency decides what kind of environmental assessment is appropriate for a proposed project.

On August 26, 2019, the Planning Department notified the following California Native American Tribes per the requirements of AB52:

- Gabrieleño Band of Mission Indians – Kizh Nation.
- Soboba Band Luiseño Indians.
- Morongo Band of Mission Indians.
- Torres Martinez Desert Cahuilla Indians.
- San Manuel Band of Mission Indians.

The Gabrieleño Band of Mission Indians – Kizh Nation and the Torres Martinez Desert Cahuilla Indians did not reply to the notice from the City. As such, no consultation was required with these two tribes.

The Morongo Band of Mission Indians replied that they had no comments. As such, no consultation was required with this tribe.

The San Manuel Band of Mission Indians replied that the proposed Project area exists within a large landscape Sacred Lands File (SLF) that the San Manuel Band of Mission Indians (SMBMI) has in place with the Native American Heritage Commission. However, due to the disturbed nature of the proposed Project location, SMBMI does not have any concerns with the Project's implementation, nor will it have any impact on the SLF. However, SMBMI is requesting that language be made a part of the project/permit/plan conditions to ensure tribal cultural resources are not impacted.

The Soboba Band Luiseño Indians requested consultation which was competed on November 4, 2019. As a result of the consultation, the following mitigation measures are recommended.

Mitigation Measures

TCR-1: A Native American Monitor from the Soboba Band of Luiseno Indians (Soboba) shall be present during all ground disturbing proceedings including but not limited to, all construction/demolition based activities, as well as archaeological surveys, testing and data recovery.

TCR-2: Prior to the issuance of any ground disturbance-related permits, the City shall contact Soboba to facilitate and coordinate communications with the contractor to develop a mutually-acceptable Tribal Monitoring Agreement. This agreement shall be approved by the City prior to the issuance of any ground disturbance-related permits and its implementation in the field enforced by the City thereafter.

TCR-3: If a cultural resource is discovered within the project area, ground disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. Representatives from Soboba, the San Manuel Band of Missions Cultural Resources Department, the contractor, and the City Community Development Department shall confer with consulting tribes regarding treatment of the discovered resource(s). A treatment plan shall be prepared, reviewed and adopted by all Parties, and then implemented to protect the identified resources from damage and destruction. The treatment plan shall contain a research design to evaluate the resource for significance under both NHPA and CEQA criteria. Then, should the resource be determined to be significant under either federal- or state-level criteria, and should the resource not be a candidate for avoidance or preservation in place, a data recovery plan shall be developed, reviewed by all Parties, and implemented. The research design and/or data recovery plan shall list the sampling procedures appropriate to ascertain the boundaries, nature, and content of the resource in accordance with current, professional archaeological best practices. Additionally, the data recovery plan will be designed to exhaust the research potential of the resource in accordance with current professional archaeology standards.

TCR-4: All draft reports containing the significance and treatment findings and data recovery results shall be prepared by a SOI-qualified archaeologist and submitted to the City of Loma Linda Community Development Department and the consulting Native American Tribes for their review and comment. All final reports are to be submitted to the local CHRIS Information Center, the City of Loma Linda, and the consulting Native American Tribes.

TCR-5: All culturally-appropriate procedures and professional standards shall be followed with respect to all artifacts and remains affiliated with Native peoples whether prehistoric, protohistoric, or historic. All artifacts shall be permitted to be either (1) left in situ should avoidance or protection in place be guaranteed or (2) reburied, on site, in a location that will be protected from future disturbance vis a vis project plans, conservation/preservation easements, deed riders, etc. In the event avoidance, preservation in place, or on-site reburial are not an option for some artifacts, the applicant/developer/landowner shall transfer the items including title, and necessary fees, to an appropriate qualified repository within San Bernardino County that meets federal standards per Secretary of the Interior Standards.

TCR-6: Where appropriate and agreed upon in advance by interested tribes, the SOI-qualified archaeologist shall conduct limited non-destructive analyses of certain artifact classes (including, but not limited to, shell, non-human bone, ceramic, stone) if required by CEQA, Section 106 of NHPA, the Project's mitigation measures, or conditions of approval for the Project. Furthermore, upon completion of authorized and mandatory archeological analysis, the contractor shall provide said artifacts to interested tribes—jointly and simultaneously --within sixty (60) days from the completion of analyses and not to exceed one hundred and twenty (120) days after the initial recovery of the items from the field.

TCR-7: In the event that any human remains are discovered during implementation of the Project, the City of Loma Linda and the Contractor shall immediately contact the Coroner and interested tribes. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c).

TCR-8: The NAHC-identified MLD, shall be allowed under California Public Resources Code § 5097.98 to inspect the site of the discovery and make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, applicant/developer/landowner, and Lead Agency agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. As required by California Public Resources Code § 5097.98, the MLD shall complete its inspection within twenty-four (24) hours of receiving notification from either the Contractor or the NAHC. All parties are aware that the MLD may wish to rebury the human remains and associated ceremonial and cultural items (artifacts) on or near the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The Contractor shall accommodate on-site reburial in a location mutually agreed upon by the Parties. The site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agency, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r).

3.18 UTILITIES AND SERVICE SYSTEMS

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?		■		
b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?			■	
c. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?			■	
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			■	
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			■	

3.18(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Determination: Less Than Significant Impact With Mitigation Incorporated.

Source: Initial Study.

Impact Analysis

The Project would require the relocation or construction of the following facilities:

Water

The Project will construct a water line that will connect to an existing water line located in Redlands Boulevard.

Wastewater Treatment

The Project will construct a sewer line that will connect to an existing sewer line located in Redlands Boulevard.

Storm Drainage

The Project proposes bioretention BMPs to be installed throughout the site in landscaped areas (e.g. on-lot infiltration is proposed via infiltration trenches and lot runoff drains to infiltration BMP prior to discharge into the street/storm drain).

Electric Power

The Project will connect to the existing Southern California Edison electrical distribution facilities available near the project site.

Natural Gas

The Project will connect to the existing Southern California Gas natural gas distribution facilities near the Project site.

Conclusions

The installation of the above described facilities as proposed by the Project would result in physical impacts to the surface and subsurface of the Project site. These impacts are considered to be part of the Project's construction phase and are evaluated throughout this Initial Study/Mitigated Negative Declaration. In instances where significant impacts have been identified, the following Mitigation Measures have been required to reduce impacts to less-than-significant levels:

CUL-1, CUL-2, GEO-1, GEO-2.

Accordingly, additional measures beyond those identified throughout this Initial Study/Mitigated Negative Declaration would not be required.

3.18(b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

Determination: Less Than Significant Impact.
Sources: 2015 San Bernardino Valley Urban Water Management Plan, City of Loma Linda Public Works Department.

Impact Analysis

The Project would be served with potable water by the City of Loma Linda. The primary source of potable water supply for the City of Loma Linda is groundwater wells within the upper Santa Ana River Basin. Replenishment of the basin is from rainfall and snow melt from the surrounding

mountains and imported water. The City also uses supplemental water obtained from the City of San Bernardino Municipal Water Department.

Water use for the Project was estimated by using The California Emissions Estimator Model (CalEEMod). The model can be used to estimate water usage for analysis in CEQA documents. The Project is estimated to have a water demand of 3.8 million gallons per year (or 10,410 gallons per day).

The San Bernardino Basin Area was defined by, and adjudicated in gross, by the Western-San Bernardino Judgment (Western Judgment) in 1969. The San Bernardino Basin Area is adjudicated on a safe yield basis. Loma Linda therefore has the opportunity to develop additional wells and over-extract groundwater under specified conditions contained in the stipulated judgment. The wells in general have provided a stable source of water supply. Extensive modeling has been used to examine groundwater recharge, groundwater pumping, basin storage, groundwater flow, and groundwater plume location and plume migration. Based on these studies it is anticipated that groundwater pumping by Loma Linda and other San Bernardino Basin Area users will not be reduced or curtailed during a single-dry or multi-dry year. (Ref. *2015 San Bernardino Valley Urban Water Management Plan, pp. 8-13-14).*

Based on the above analysis, impacts are less than significant.

3.18(c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

Determination: Less Than Significant Impact.
Sources: 2010 San Bernardino Valley Urban Water Management Plan, City of Loma Linda Public Works Department.

Impact Analysis

Sanitary sewer service to the Project site would be provided by the Loma Linda Public Works Department. Wastewater treatment for the City of Loma Linda is provided by the San Bernardino Municipal Water Department Water Reclamation Plant which is a 33 MGD Regional Secondary Treatment facility.

Wastewater use for the Project was estimated by using the California Emissions Estimator Model (CalEEMod). The model can be used to estimate wastewater usage for analysis in CEQA documents. The Project is estimated to have an indoor water demand of 3.8 million gallons per year which includes wastewater. The increase in wastewater from the proposed Project can be accommodated within the 33 MGD operational capacity of the San Bernardino Municipal Water Department Water Reclamation Plant. Therefore, implementation of the proposed Project would not result in impacts related to wastewater treatment provider capacity, and impacts are less than significant.

3.18 (d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Determination: Less Than Significant Impact.
Source: CalRecycle.

Impact Analysis

Construction Related Impacts

Waste generated during the construction phase of the project would primarily consist of discarded materials from the construction of streets, common areas, infrastructure installation, and other Project-related construction activities. The California Green Building Standards Code ("CALGreen'), requires all newly constructed buildings to prepare a Waste Management Plan and divert construction waste through recycling and source reduction methods. The City of Loma Linda reviews and approves all new construction projects required to submit a Waste Management Plan. Mandatory compliance with CALGreen solid waste requirements will ensure that construction waste impacts are less than significant.

Operational Related Impacts

Waste generated during the operation of the Project is estimated to be 328 tons per year based on the California Emissions Estimator Model (CalEEMod) which is a statewide land use emissions computer model which can be used to estimate solid waste generation rates for various types of land uses for analysis in CEQA documents.

Solid waste generated in the Project area is generally transported to the transported to the El Sobrante Landfill, located in the City of Corona. According to the Cal Recycle Facility/Site Summary Details website accessed on October 22, 2019, the El Sobrante Landfill has a remaining capacity of 143,977,170 cy and is not anticipated to reach capacity until 2051. As such, the Project will not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

Based on the above analysis, impacts are less than significant.

3.18(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Determination: Less Than Significant Impact.
Sources: California Assembly Bill 939 (Sher), San Bernardino County, Countywide Integrated Waste Management Plan.

Impact Analysis

The California Integrated Waste Management Act established an integrated waste management system that focused on source reduction, recycling, composting, and land disposal of waste. In

addition, the Act established a 50% waste reduction requirement for cities and counties by the year 2000, along with a process to ensure environmentally safe disposal of waste that could not be diverted. Per the requirements of the Integrated Waste Management Act, the San Bernardino County Board of Supervisors adopted the *Countywide Integrated Waste Management Plan* which outlines the goals, policies, and programs the County and its cities will implement to create an integrated and cost effective waste management system that complies with the provisions of California Integrated Waste Management Act and its diversion mandates.

The Project's waste hauler would be required to coordinate with the waste hauler to develop collection of recyclable materials for the Project on a common schedule as set forth in applicable local, regional, and State programs. Recyclable materials that would be recycled by the Project include paper products, glass, aluminum, and plastic.

Additionally, the Project's waste hauler would be required to comply with all applicable local, State, and Federal solid waste disposal standards, thereby ensuring that the solid waste stream to the landfills that serve the Project are reduced in accordance with existing regulations.

Based on the above analysis, impacts are less than significant.

3.19 WILDFIRE

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
3.19.	**WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:**				
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a-d) **Determination: No Impact.**

Source: California Board of Forestry and Fire Protection.

The State Responsibility Areas (SRA) dataset on the Cal Fire website identifies areas of legal responsibility for fire protection, including State Responsibility Areas (SRA), Federal Responsibility Areas (FRA), and Local Responsibility Areas (LRA). CAL FIRE has a legal responsibility to provide fire protection on all State Responsibility Area (SRA) lands, which are defined based on land ownership, population density and land use.

According to the Board of Forestry and Fire Protection website accessed on October 22, 2019, the Project site is not located within or near a state responsibility area or lands classified as very high fire hazard severity zone. As such, there is no impact.

3.20 MANDATORY FINDINGS OF SIGNIFICANCE

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		■		
b. Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		■		
c. Does the Project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?		■		

Impact Analysis

3.18(a) Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Determination: Less Than Significant Impact With mitigation Incorporated.
Source: This Initial Study Checklist.

As noted in the analysis throughout this Initial Study Checklist, the following mitigation measures apply to the Project and would reduce impacts relating to this issue. These mitigation measures will be included in the Project's Mitigation Monitoring and Reporting Program:

Mitigation Measures (MM)

CUL-1, CUL-2.

Impact Analysis

All impacts to the environment, including impacts to habitat for fish and wildlife species, fish and wildlife populations, plant and animal communities, rare and endangered plants and animals, and historical and pre-historical resources were evaluated as part of this Initial Study Checklist..

In instances where impacts have been identified, the mitigation measures listed above are required to reduce impacts to less than significant levels. Therefore, Project would not substantially degrade the quality of the environment.

3.18(b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Determination: Less Than Significant Impact With Mitigation Incorporated.
Source: This Initial Study Checklist.

As noted in the analysis throughout this Initial Study Checklist, the following mitigation measures apply to the Project and would reduce impacts relating to biological resources, cultural resources and noise. These mitigation measures will be included in the Project's Mitigation Monitoring and Reporting Program.

Mitigation Measures (MM)

CUL-1, CUL-2, GEO-1, GEO-2, TRAN-1, TCR-1 through TCR-8.

Impact Analysis

As discussed throughout this Initial Study Checklist, implementation of the proposed Project has the potential to result in effects to the environment that are individually limited, but cumulatively considerable.

In instances where impacts to biological resources, cultural resources, and noise have been identified, the Mitigation Measures, listed above are required to reduce impacts to less than significant levels.

3.18(c) Does the Project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?

Determination: Less Than Significant Impact.
Source: This Initial Study Checklist.

As noted in the analysis throughout this Initial Study Checklist, the following mitigation measure applies to the Project and would reduce impacts relating to noise. The noise impact mitigation measure will be included in the Project's Mitigation Monitoring and Reporting Program:

Mitigation Measures (MM)

TRAN-1.

Impact Analysis

The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this Initial Study Checklist document.

In instances where impacts have been identified, Mitigation Measure NOI-1 is required to reduce construction noise impacts.

4.0 REFERENCES

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